

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF EPLUS'S OBJECTIONS TO DEFENDANT'S DESIGNATION AND  
SUMMARY OF THE DEPOSITION OF WILLIAM RAY YUHASZ AND VICKY  
MILLER WILLIAMS AND COUNTER-DESIGNATIONS**

**Specific Objections**

<b>Defendant's Designations</b>	<b>ePlus's Objections (designations)</b>	<b>ePlus's Objections (summary)</b>
9:11-23		
13:1-19		
14:9-12		
17:5-7		
18:3-17		Mischaracterizes testimony (Mr. Yuhasz testified that Novant did not use any Lawson employees in implementing <i>the new version of Requisitions Self-Service</i> )
35:1-36:5	701	
36:24-37:8		Mischaracterizes testimony (Mr. Yuhasz testified that the Lawson system as configured at Novant does not have the ability to determine the quantity of items available on hand from suppliers)
57:21-58:5		
63:5-14		
65:22-24		
71:10 – 72:5		
77:19-24	402; 403	Mischaracterizes testimony (Mr. Yuhasz testified that the Lawson

<b>Defendant's Designations</b>	<b>ePlus's Objections (designations)</b>	<b>ePlus's Objections (summary)</b>
		system will not provide for the creation of purchase orders <i>once the Ariba system is implemented at Novant</i> )
78:8 – 79:10		
85:6-10		
95:16 – 96:12	402	
105:4-17		
121:7-22	602	
144:19-25		Mischaracterizes testimony (Ms. Williams testified that the specific program that she was using at that time would not show if an item was available from a different manufacturer)
159:7-13		
159:25 – 160:21	403; 701 (160:9-17)	Incomplete summary (Mr. Yuhasz testified that Novant receives the textual information from its suppliers)
161:23-162:21	403; 701 (161:23-162:4)	
165:12-18	403; 602; 701	
165:25-166:7	403; 602; 701	Mischaracterizes testimony (Mr. Yuhasz testified that he himself did not know how to tell if the items selected from the results of a search are general equivalents)
167:11-168:5	403; 602	
170:9-171:7	403; 602	

### **Counter-Designations**

<b>ePlus's Counter-Designations</b>
14:13-18
18:18-23
61:4-11
62:7-24
65:7-21
76:6-77:18
77:25-78:5
145:1-5
159:21-24
160:22-161:4

Respectfully submitted,

Dated: August 9, 2010

/s/

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**William R. Yuhasz and Vicky M. Williams – Rebuttal Summary**

Mr. Yuhasz was not sure whether Lawson EDI was included within Novant's license agreement with Lawson, but when he said ERP was licensed from Lawson, he thinks that was all included in that license agreement. (14:13-18)

Mr. Yuhasz was unsure how Lawson Requisitions Self-Service was delivered to Novant. (18:18-23)

Requisitions Self-Service includes a search catalog feature. The Lawson system employed by Novant has this functionality. (61:4-11; 62:7-24)

Lawson provided step-by-step training to Novant on how to complete a Requisitions Self-Service form as described in the Supply Chain NMG Ambulatory Care Manual. (65:7-21)

The Ariba system has not been implemented at Novant yet. Once implemented, Ariba purchase orders and receipt transactions will be copied to the Lawson procurement system for invoice matching. (76:6-77:18; 77:25-78:5)

Items available from a different manufacturer could not be shown within the particular Lawson program being used at that time to determine which items could be ordered from a location other than inventory to generate a purchase order. (145:1-5)

Text descriptions and images are associated with items in the Lawson Item Master. Mr. Yuhasz did not recall whether Lawson provided any instructions on setting up textual information for items. (159:21-24)

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 RICHMOND DIVISION</p> <p>4 ePlus Inc., )</p> <p>5 Plaintiff, )</p> <p>6 vs. ) CIVIL ACTION NO.</p> <p>7 ) 2:09-CV-232,</p> <p>8 PERFECT COMMERCE, INC., )</p> <p>9 SCIQUEST, INC., LAWSON )</p> <p>10 SOFTWARE, INC., and VERIAN )</p> <p>11 TECHNOLOGIES, INC., )</p> <p>12 Defendants. )</p> <p>13 _____ )</p> <p>14 VIDEOTAPED 30(b)(6) DEPOSITION OF NOVANT HEALTH,</p> <p>15 INC., by and through its corporate designees,</p> <p>16 WILLIAM RAY YUHASZ and VICKY MILLER WILLIAMS</p> <p>17 (Taken by Plaintiff)</p> <p>18 Winston-Salem, North Carolina</p> <p>19 Friday, February 19, 2010</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 Reported in Stenotype by</p> <p>25 Dorothy J. M. McGrath, RPR, Shorthand Reporter</p> <p>Transcript Produced by Computer-aided Transcription</p>	<p>1 INDEX OF EXAMINATIONS</p> <p>2 By Mr. Robertson ..... 5</p> <p>3 By Mr. Graham ..... 159</p> <p>4 By Mr. Robertson ..... 167</p> <p>5</p> <p>6 INDEX OF EXHIBITS</p> <p>7 NUMBER DESCRIPTION MARKED</p> <p>8 N1 Subpoena ..... 29</p> <p>9 N2 Lawson Software Product License ..... 45</p> <p>10 Agreement (NOV0729 - 832)</p> <p>11</p> <p>12 N3 Lawson Software, Inc., Services ..... 49</p> <p>13 Confirmation (L0156778)</p> <p>14 N4 Product Order Form, Lawson Software ... 50</p> <p>15 Consumer Agreement (L0156759 - 763)</p> <p>16</p> <p>17 N5 Lawson Software, Inc., Services ..... 53</p> <p>18 Agreement (NOW0725 - 728)</p> <p>19 N6 Requisition Self-Service RSS 9 ..... 57</p> <p>20 Training Manual, November 2009</p> <p>21 (NOV0838 - 868)</p> <p>22 N7 Supply Chain NMG Ambulatory Care ..... 63</p> <p>23 Manual (NOV0870 - 904)</p> <p>24</p> <p>25 N8 Lawson/SciQuest Procure-to-Pay ..... 71</p> <p>(P2P) Solutions Overview for Novant</p> <p>Health (LE00509459 - 464)</p> <p>N9 Series of E-mail with Various ..... 78</p> <p>Attached Documents (NOV0394 - 443)</p> <p>N10 E-mail with Attached Presentation ..... 90</p> <p>Referencing Novant Responses to RFP</p> <p>Question (ePLUS0911571 - 582)</p> <p>N11 Document Titled Novant Health P2P ..... 95</p> <p>Project Dated 1/16/2009 (LE00504119</p> <p>- 121)</p>
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William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>5</p> <p>1 PROCEEDINGS</p> <p>2 VIDEO TECHNICIAN: All right. Here begins</p> <p>3 Videotape Number 1 in the 30(b)(6) deposition of</p> <p>4 William Ray Yuhasz and Vicky Williams in the matter</p> <p>5 of ePlus, Incorporated, versus Perfect Commerce,</p> <p>6 Incorporated; SciQuest, Incorporated; Lawson</p> <p>7 Software, Incorporated; and Verian Technologies,</p> <p>8 Incorporated, in the United States District Court</p> <p>9 for the Eastern District of Virginia, Civil Action</p> <p>10 Number 2:09-CV-232. Today's date is February 19th,</p> <p>11 2010. The time on the video monitor is 08:42.,</p> <p>12 Video operator today is Rob Hahn of LAD</p> <p>13 Reporting. This deposition is taking place at</p> <p>14 119 Brookstown Avenue in Winston-Salem, North</p> <p>15 Carolina. Counsel, please identify yourself for the</p> <p>16 record and state whom you represent.</p> <p>17 (WHEREUPON, INTRODUCTIONS ARE MADE)</p> <p>18 VIDEO TECHNICIAN: The court reporter today is</p> <p>19 Dorothy McGrath of LAD Reporting. Would the</p> <p>20 reporter please swear in the witness.</p> <p>21 WILLIAM RAY YUHASZ and VICKY MILLER WILLIAMS,</p> <p>22 having been duly sworn, testifies as follows:</p> <p>23 EXAMINATION</p> <p>24</p> <p>25</p>	<p>7</p> <p>1 actually, so we -- give me -- so it can be recorded</p> <p>2 by the stenographer and videographer. Let me ask</p> <p>3 you first, Mr. Yuhasz, have you ever been deposed</p> <p>4 before, sir?</p> <p>5 MR. YUHASZ: No.</p> <p>6 MR. ROBERTSON: Okay. How about you,</p> <p>7 Ms. Williams?</p> <p>8 MS. WILLIAMS: No.</p> <p>9 MR. ROBERTSON: Okay. Let me then just briefly</p> <p>10 go through some of the ground rules. You're here</p> <p>11 today pursuant to a subpoena that was issued by my</p> <p>12 client, ePlus, to Novant that had certain topics</p> <p>13 that involve the Lawson requisitioning software</p> <p>14 system that's employed by Novant. Do you understand</p> <p>15 that?</p> <p>16 MR. YUHASZ: Correct.</p> <p>17 MR. ROBERTSON: You have to answer verbally --</p> <p>18 good --</p> <p>19 MS. WILLIAMS: Yes.</p> <p>20 MR. ROBERTSON: Good. And if at any time I ask</p> <p>21 a question that you don't understand or you think is</p> <p>22 confusing, please just let me know, and I'll try to</p> <p>23 restate the question or rephrase it in a way that</p> <p>24 might be more clear. As I said, you have to answer</p> <p>25 verbally. From time to time your counsel</p>
<p>6</p> <p>1 MR. ROBERTSON: Good morning, Mr. Yuhasz and</p> <p>2 Ms. Williams. Lets do this first: Mr. Yuhasz, can</p> <p>3 you just state your full name for the record and</p> <p>4 your address, your current address?</p> <p>5 MR. YUHASZ: It's William Ray Yuhasz. It's</p> <p>6 427 Beaten Path Road in Mooresville, North Carolina</p> <p>7 28117.</p> <p>8 MR. ROBERTSON: Okay. And, Ms. Williams, could</p> <p>9 you do the same, please?</p> <p>10 MS. WILLIAMS: Vicky Williams, 4680 Duffer</p> <p>11 Court, Pfafftown, North Carolina 27040.</p> <p>12 MR. ROBERTSON: It's a little unusual having</p> <p>13 two deponents, so let me just -- I'm going to just</p> <p>14 ask you general questions first, Mr. Yuhasz, and</p> <p>15 then Ms. Williams so we have an understanding of</p> <p>16 where we are. And then I'll proceed with the</p> <p>17 deposition of Mr. Yuhasz and, you know, if there's</p> <p>18 issues that he can't address and Ms. Williams may be</p> <p>19 familiar with, it's been suggested by counsel that</p> <p>20 we could just switch in or switch out depending</p> <p>21 on -- on, you know, the topic that you may be</p> <p>22 knowledgeable about; is that correct with you?</p> <p>23 MR. YUHASZ: (Nods head.)</p> <p>24 MS. WILLIAMS: Yes.</p> <p>25 MR. ROBERTSON: You have to answer verbally</p>	<p>8</p> <p>1 Mr. Stafford may interpose an objection. Unless he</p> <p>2 instructs you not to answer the question, you still</p> <p>3 need to answer the question. Do you understand</p> <p>4 that?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Okay.</p> <p>7 MS. WILLIAMS: Yes.</p> <p>8 MR. ROBERTSON: Okay. Do you have any</p> <p>9 questions about the process?</p> <p>10 MR. YUHASZ: No.</p> <p>11 MS. WILLIAMS: No.</p> <p>12 MR. ROBERTSON: Okay. Great. Why don't I</p> <p>13 start then with Mr. Yuhasz. If you want to go</p> <p>14 relax, Ms. Williams, and we'll see if we are in need</p> <p>15 of your services.</p> <p>16 We talked about this briefly before we</p> <p>17 started the deposition, Mr. Yuhasz, but I mean, the</p> <p>18 purpose I'm here today is just to understand the</p> <p>19 actual operating Lawson requisition system employed</p> <p>20 by Novant, and so I appreciate the fact that you</p> <p>21 appear to have it open on your laptop computer. And</p> <p>22 I'm going to want to go to, you know, certain</p> <p>23 screens and -- and see what we could do with that</p> <p>24 functionality. In particular, I want to see how we</p> <p>25 can search for items, how we can then build</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>9</p> <p>1 requisitions of those items for purchase, and then</p> <p>2 generate purchase orders. I'll be looking to see if</p> <p>3 we can find items for multiple vendors, see if I can</p> <p>4 find same or similar items of multiple vendors and</p> <p>5 do sort of comparisons between them, whether I have</p> <p>6 to do that by keyword or by part number or whatever</p> <p>7 manner you can show me. But my questions I'll try</p> <p>8 to be as specific as possible. So are you</p> <p>9 comfortable with that --</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: How -- how long have you been</p> <p>12 working with Novant, sir?</p> <p>13 MR. YUHASZ: 12 years.</p> <p>14 MR. ROBERTSON: Since 1998?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: Okay. And what is your</p> <p>17 position currently, sir?</p> <p>18 MR. YUHASZ: Director of logistics technology.</p> <p>19 MR. ROBERTSON: Is that in the information</p> <p>20 technology department of the company?</p> <p>21 MR. YUHASZ: No. The position reports to</p> <p>22 supply chain, to the chief -- through the chief</p> <p>23 financial -- chief supply chain officer.</p> <p>24 MR. ROBERTSON: And who is that gentleman?</p> <p>25 MR. YUHASZ: Tony Johnson.</p>	<p>11</p> <p>1 MR. ROBERTSON: Are you responsible at all for</p> <p>2 actual procurement of goods for Novant?</p> <p>3 MR. YUHASZ: No.</p> <p>4 MR. ROBERTSON: Okay. You just support those</p> <p>5 who then do the procurement; is that right?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: And as the director of</p> <p>8 logistics technology, how long have you been working</p> <p>9 with the Lawson requisition product?</p> <p>10 MR. YUHASZ: Just the -- the requisition</p> <p>11 self-service or the requisition of the ERP system?</p> <p>12 MR. ROBERTSON: Let's start out with the</p> <p>13 requisition self-service.</p> <p>14 MR. YUHASZ: Requisition self-service, probably</p> <p>15 five years also.</p> <p>16 MR. ROBERTSON: Ever since you became the</p> <p>17 director of logistics -- oh, no, excuse me. Prior</p> <p>18 to five years ago when you started using requisition</p> <p>19 self-service, were you using some sort of</p> <p>20 requisition procurement software?</p> <p>21 MR. YUHASZ: The basic requisitioning in the</p> <p>22 ERP system.</p> <p>23 MR. ROBERTSON: When you say ERP --</p> <p>24 MR. YUHASZ: Uh-huh.</p> <p>25 MR. ROBERTSON: -- that stands for</p>
<p>10</p> <p>1 MR. ROBERTSON: And where is Mr. Johnson a</p> <p>2 resident? Where is he --</p> <p>3 MR. YUHASZ: His personal residence or for</p> <p>4 work --</p> <p>5 MR. ROBERTSON: No, no. Where does he work?</p> <p>6 MR. YUHASZ: In Winston-Salem.</p> <p>7 MR. ROBERTSON: Okay. What are your job</p> <p>8 responsibilities, sir, as the director of logistics</p> <p>9 technologies?</p> <p>10 MR. YUHASZ: Provide the functional support for</p> <p>11 the supply chain technology.</p> <p>12 MR. ROBERTSON: How long have you had that</p> <p>13 position?</p> <p>14 MR. YUHASZ: Five years.</p> <p>15 MR. ROBERTSON: Just briefly, what did you do</p> <p>16 before you were the director of logistics</p> <p>17 technology?</p> <p>18 MR. YUHASZ: I was technical lead for finance.</p> <p>19 MR. ROBERTSON: When you use the term "supply</p> <p>20 chain technology," what do you mean by that, sir?</p> <p>21 MR. YUHASZ: The technology enablers to -- for</p> <p>22 supply chain to support the business needs. My team</p> <p>23 supports the functional aspects of those enablers to</p> <p>24 configure them, know how to use them, and report</p> <p>25 from them, use the data.</p>	<p>12</p> <p>1 enterprise --</p> <p>2 MR. YUHASZ: -- resource planning.</p> <p>3 MR. ROBERTSON: Enterprise resource planning.</p> <p>4 Was that a Lawson product that you were using?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Okay. Do you know how long</p> <p>7 Novant's been using Law-- some type of Lawson</p> <p>8 requisitioning product, either ERP or requisition</p> <p>9 self-service?</p> <p>10 MR. YUHASZ: The ERP began in 1997.</p> <p>11 MR. ROBERTSON: How about the requisition --</p> <p>12 MR. YUHASZ: I mean, 1999, sorry.</p> <p>13 MR. ROBERTSON: Okay. And did I understand you</p> <p>14 to say requisition self-service for approximately</p> <p>15 the last five years?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Okay. Do you know whether or</p> <p>18 not Novant uses any other kind of software modules,</p> <p>19 I'll call them, with respect to procurement from</p> <p>20 Lawson?</p> <p>21 MR. YUHASZ: From Lawson?</p> <p>22 MR. ROBERTSON: Let me ask you -- maybe if I</p> <p>23 throw out some names for you, you can tell me</p> <p>24 whether they're familiar.</p> <p>25 MR. YUHASZ: Okay.</p>

<p>13</p> <p>1 MR. ROBERTSON: Before we started the</p> <p>2 deposition you talked about procurement punch-out.</p> <p>3 Do I understand you to say Novant doesn't use</p> <p>4 punch-out?</p> <p>5 MR. YUHASZ: Correct, we don't use punch-out.</p> <p>6 MR. ROBERTSON: Do you have that module and</p> <p>7 just not use it or have you -- did you just not</p> <p>8 purchase it from Lawson?</p> <p>9 MR. YUHASZ: We have the module, and we do not</p> <p>10 use it.</p> <p>11 MR. ROBERTSON: Okay. Were you --</p> <p>12 notwithstanding that you don't use it in the</p> <p>13 everyday course of Novant's business, would you be</p> <p>14 able to demonstrate its capabilities today?</p> <p>15 MR. YUHASZ: No.</p> <p>16 MR. ROBERTSON: And is that because you don't</p> <p>17 have any punch-out vendors that are configured with</p> <p>18 that software module?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: Okay. How about -- there's a</p> <p>21 module known as inventory control. Do you know</p> <p>22 whether or not Novant employs that --</p> <p>23 MR. YUHASZ: Yes, we do use inventory control.</p> <p>24 MR. ROBERTSON: Okay. How about, there's a</p> <p>25 separate module called the purchase order module.</p>	<p>15</p> <p>1 little --</p> <p>2 MR. YUHASZ: Yeah.</p> <p>3 MR. ROBERTSON: You seem confused.</p> <p>4 MR. YUHASZ: Right.</p> <p>5 MR. ROBERTSON: ERP can include a broad</p> <p>6 spectrum of software functionality beyond</p> <p>7 requisitioning, correct?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: Okay. So do you know what</p> <p>10 other types of functionality form the -- a part of</p> <p>11 the Lawson ERP solutions that Novant has?</p> <p>12 MR. YUHASZ: For procurement purposes or for</p> <p>13 supply chain uses, is warehouse.</p> <p>14 MR. ROBERTSON: I'm sorry, it's called</p> <p>15 warehouse?</p> <p>16 MR. YUHASZ: Warehouse.</p> <p>17 MR. ROBERTSON: What's that?</p> <p>18 MR. YUHASZ: It's integrated with the inventory</p> <p>19 control module --</p> <p>20 MR. ROBERTSON: Okay.</p> <p>21 MR. YUHASZ: -- so that you can pick and ship</p> <p>22 from your inventory.</p> <p>23 MR. ROBERTSON: Okay. So this is from Novant's</p> <p>24 own inventory that it could deliver product?</p> <p>25 MR. YUHASZ: Correct.</p>
<p>14</p> <p>1 Do you know whether or not Novant employs that</p> <p>2 purchase order module?</p> <p>3 MR. YUHASZ: Yes, we use the purchase order</p> <p>4 module.</p> <p>5 MR. ROBERTSON: And you've already indicated</p> <p>6 that you use the module known as requisition</p> <p>7 self-service, correct?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: There's also a module that</p> <p>10 enables EDI. Are you familiar with that?</p> <p>11 MR. YUHASZ: Yes, and we do not have that</p> <p>12 employed, the Lawson EDI.</p> <p>13 MR. ROBERTSON: You don't have it employed.</p> <p>14 Have you -- do you know whether you purchased it</p> <p>15 from Lawson?</p> <p>16 MR. YUHASZ: I'm not for sure, but when I say</p> <p>17 ERP, I think that's all included in that license</p> <p>18 agreement.</p> <p>19 MR. ROBERTSON: As part of the ERP solutions</p> <p>20 that -- that Lawson offers --</p> <p>21 MR. YUHASZ: Right.</p> <p>22 MR. ROBERTSON: -- there's a number of other</p> <p>23 types of software functionality besides what we've</p> <p>24 been calling requisition and procurement, correct?</p> <p>25 Let me rephrase the question because you're a</p>	<p>16</p> <p>1 MR. ROBERTSON: Lawson offers other ERP</p> <p>2 solutions such as, you know, human resources and</p> <p>3 financial administration. Are you familiar at all</p> <p>4 with those?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Do you know whether Novant</p> <p>7 employs those at all?</p> <p>8 MR. YUHASZ: We use the finance.</p> <p>9 MR. ROBERTSON: Any other ERP solutions that</p> <p>10 you're aware of that Novant uses from Lawson?</p> <p>11 MR. YUHASZ: No.</p> <p>12 MR. ROBERTSON: Just focusing in on this</p> <p>13 requisition self-service that you indicated you've</p> <p>14 been utilizing for approximately the last five</p> <p>15 years, have you gone through any iterations or</p> <p>16 versions of it, any updates?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: How many approximately? Do you</p> <p>19 know?</p> <p>20 MR. YUHASZ: I'm going to estimate three.</p> <p>21 MR. ROBERTSON: Do you recall when the last</p> <p>22 update for the requisition self-service occurred?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: Okay.</p> <p>25 MR. YUHASZ: December 2009.</p>

<p>17</p> <p>1 MR. ROBERTSON: Okay. And why is that amusing</p> <p>2 to you?</p> <p>3 MR. YUHASZ: The upgrade quality is a little</p> <p>4 poor.</p> <p>5 MR. ROBERTSON: Oh. As you -- did -- did</p> <p>6 Lawson assist in the upgrade?</p> <p>7 MR. YUHASZ: No.</p> <p>8 MR. ROBERTSON: Okay. How -- how did the</p> <p>9 upgrade occur?</p> <p>10 MR. YUHASZ: What -- what are you -- what --</p> <p>11 MR. ROBERTSON: I mean, how does the upgrade</p> <p>12 get delivered to you, how do you implement it, how</p> <p>13 do you get it up and running?</p> <p>14 MR. YUHASZ: Well, you have to order it through</p> <p>15 Lawson, and -- and they deliver the software to our</p> <p>16 technical team that reports through information</p> <p>17 technology, and they install it, and then --</p> <p>18 MR. ROBERTSON: You said "they." Who's they?</p> <p>19 MR. YUHASZ: The Lawson application technical</p> <p>20 team that reports to information technology, so they</p> <p>21 handle the more technical aspects of installing the</p> <p>22 actual software, and then when they -- then they</p> <p>23 turn it over to the business users such as myself to</p> <p>24 get it configured and tested.</p> <p>25 MR. ROBERTSON: Okay. How -- how long -- you</p>	<p>19</p> <p>1 with respect to this requisition self-service</p> <p>2 software?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Okay. What does the</p> <p>5 maintenance involve?</p> <p>6 MR. YUHASZ: The maintenance agreement, what it</p> <p>7 primarily allows is the ongoing upgrades, receive</p> <p>8 those, annual maintenance, and then support --</p> <p>9 center support from Lawson.</p> <p>10 MR. ROBERTSON: And what's involved in the</p> <p>11 support center? Is that a 24/7 online capability,</p> <p>12 or is it, you know, a telephone bank? What's</p> <p>13 involved?</p> <p>14 MR. YUHASZ: It's both.</p> <p>15 MR. ROBERTSON: Okay.</p> <p>16 MR. YUHASZ: You have both capabilities.</p> <p>17 MR. ROBERTSON: And has Novant utilized those</p> <p>18 available features as part of the maintenance?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Again, why is -- why do you</p> <p>21 find that amusing?</p> <p>22 MR. YUHASZ: As I -- as I pointed out earlier,</p> <p>23 the quality of the upgrade was less --</p> <p>24 MR. ROBERTSON: Less than ideal?</p> <p>25 MR. YUHASZ: -- than ideal.</p>
<p>18</p> <p>1 said this occurred December of 2009?</p> <p>2 MR. YUHASZ: Uh-huh.</p> <p>3 MR. ROBERTSON: Approximately how long did it</p> <p>4 take for Lawson to load the new version of</p> <p>5 requisition self-service?</p> <p>6 MR. YUHASZ: The entire implementation</p> <p>7 timeline?</p> <p>8 MR. ROBERTSON: Yes, sir.</p> <p>9 MR. STAFFORD: Object to form. Go ahead.</p> <p>10 MR. YUHASZ: Excuse me. The entire timeline,</p> <p>11 probably four months.</p> <p>12 MR. ROBERTSON: And approximately how many</p> <p>13 Lawson personnel assisted you in that process? One</p> <p>14 individual --</p> <p>15 MR. YUHASZ: Lawson employees?</p> <p>16 MR. ROBERTSON: Yes, sir.</p> <p>17 MR. YUHASZ: No.</p> <p>18 MR. ROBERTSON: Okay. Well, what did they do</p> <p>19 when they delivered it to you? Did they deliver it</p> <p>20 to you in person?</p> <p>21 MR. YUHASZ: I can't answer that. I -- I think</p> <p>22 it's electronic. That's -- that's through the</p> <p>23 Lawson application team to how they deliver it.</p> <p>24 MR. ROBERTSON: Do you know whether or not</p> <p>25 Novant has any maintenance agreement with Lawson</p>	<p>20</p> <p>1 MR. ROBERTSON: So you had to utilize those</p> <p>2 services with respect to this latest implementation?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: Okay. Any other service or</p> <p>5 maintenance capabilities that Novant enjoys by</p> <p>6 virtue of this contract with Lawson?</p> <p>7 MR. YUHASZ: The only other thing that might be</p> <p>8 included is we have the online library of education</p> <p>9 materials.</p> <p>10 MR. ROBERTSON: Okay. That's like product</p> <p>11 guides and things like that?</p> <p>12 MR. YUHASZ: Well, no, it's more than the</p> <p>13 product guides. It's -- it's more education to a</p> <p>14 role of someone using the software like a -- what a</p> <p>15 material handler might use, what a receiver might</p> <p>16 use. You can -- it's more education material for</p> <p>17 roles to use their software.</p> <p>18 MR. ROBERTSON: Do you know whether or not</p> <p>19 Lawson's provided Novant with any specific product</p> <p>20 guides as to how to utilize the requisition</p> <p>21 self-service module?</p> <p>22 MR. YUHASZ: Yes, they're -- they're provided</p> <p>23 with the upgrades online.</p> <p>24 MR. ROBERTSON: Have you had an opportunity to</p> <p>25 review those documents on occasion?</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>21</p> <p>1 MR. YUHASZ: On occasion.</p> <p>2 MR. ROBERTSON: Okay. Have you ever had the</p> <p>3 experience where Lawson has had to actually send one</p> <p>4 of their employees to assist Novant in the operation</p> <p>5 of these procurement software modules we've been</p> <p>6 talking about?</p> <p>7 MR. YUHASZ: You want to limit it to a time</p> <p>8 frame or --</p> <p>9 MR. ROBERTSON: Well, let's just start with</p> <p>10 ever. Has it -- has it ever occurred in your</p> <p>11 experiences as the director of logistics technology</p> <p>12 utilizing this requisition software that Lawson's</p> <p>13 actually provided a human being to come and assist</p> <p>14 you with any kind of issues that have arisen?</p> <p>15 MR. YUHASZ: Specifically with requisition</p> <p>16 self-service, the only time I think Lawson assisted</p> <p>17 Novant was during the initial implementation.</p> <p>18 MR. ROBERTSON: And was that of the ERP system,</p> <p>19 or was that of the requisition self-service?</p> <p>20 MR. YUHASZ: Of the requisition self-service.</p> <p>21 MR. ROBERTSON: So approximately five years ago</p> <p>22 when you first loaded it and had it up and running?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. ROBERTSON: Okay. How -- how long did that</p> <p>25 take approximately?</p>	<p>23</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: Do you know approximately --</p> <p>3 under the license Lawson has -- how many users can</p> <p>4 utilize the requisition software?</p> <p>5 MR. YUHASZ: No, I don't know the current</p> <p>6 that's -- that's maintained by the information</p> <p>7 technology group.</p> <p>8 MR. ROBERTSON: Okay. Do you know</p> <p>9 Ms. Williams?</p> <p>10 MS. WILLIAMS: No, I do not.</p> <p>11 MR. ROBERTSON: Okay. Thank you. All right.</p> <p>12 Just as a practical matter, do you know how many</p> <p>13 people approximately can utilize the requisition</p> <p>14 self-service application at Novant?</p> <p>15 MR. YUHASZ: Can we restrict that to actively</p> <p>16 use it?</p> <p>17 MR. ROBERTSON: Sure, let's start with that.</p> <p>18 MR. YUHASZ: I'm going to estimate we have</p> <p>19 probably between 1800 and 2000 users.</p> <p>20 MR. ROBERTSON: Okay. Novant's a fairly large</p> <p>21 company, I gather --</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: Do you know approximately how</p> <p>24 many employees Novant has?</p> <p>25 MR. YUHASZ: My estimate is around 13,000.</p>
<p>22</p> <p>1 MR. YUHASZ: Are you speaking just to</p> <p>2 requisition self-service implementation --</p> <p>3 MR. ROBERTSON: Yes.</p> <p>4 MR. YUHASZ: It's difficult to parse out</p> <p>5 because it was part of a larger project --</p> <p>6 MR. ROBERTSON: Okay.</p> <p>7 MR. YUHASZ: -- for upgrading. Again, that --</p> <p>8 it was part of an upgrade to -- of the ERP system,</p> <p>9 and then we attached the implementation of RSS. So</p> <p>10 I don't -- I mean --</p> <p>11 MR. ROBERTSON: I understand it's difficult to</p> <p>12 answer that because it was part of a larger project.</p> <p>13 MR. YUHASZ: Correct.</p> <p>14 MR. ROBERTSON: With requisition self-service,</p> <p>15 it's my understanding that a number of individuals</p> <p>16 can actually access that functionality and go</p> <p>17 through the procurement process. Is that fair to</p> <p>18 say that's how it operates at Novant?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: Do you know -- and I've seen in</p> <p>21 some of the documents provided by Lawson that the</p> <p>22 license fee for the requisition software actually is</p> <p>23 tied to the number of users who can utilize the</p> <p>24 application. Is that consistent with your</p> <p>25 understanding?</p>	<p>24</p> <p>1 Okay. It's grown. We've added on new facilities in</p> <p>2 the last four months.</p> <p>3 MR. ROBERTSON: All right. It's more than --</p> <p>4 more than 10,000 people?</p> <p>5 MR. YUHASZ: More than 10,000.</p> <p>6 MR. ROBERTSON: And of the more than 10,000,</p> <p>7 somewhere like around 1800 can actually access the</p> <p>8 requisition self-service application?</p> <p>9 MR. YUHASZ: Correct.</p> <p>10 MR. ROBERTSON: And Novant has a number of</p> <p>11 facilities, correct?</p> <p>12 MR. YUHASZ: Correct.</p> <p>13 MR. ROBERTSON: Is the main facility here in</p> <p>14 Winston-Salem?</p> <p>15 MR. YUHASZ: For -- that -- ordering or what do</p> <p>16 you mean by facility?</p> <p>17 MR. ROBERTSON: Just the main office. The</p> <p>18 headquarters?</p> <p>19 MR. YUHASZ: The headquarters is located in</p> <p>20 Winston-Salem.</p> <p>21 MR. ROBERTSON: Okay. Is that where most of</p> <p>22 the employees are resident at -- for Novant in</p> <p>23 Winston-Salem? Excuse my ignorance about the</p> <p>24 company. I'm just trying to understand --</p> <p>25 MR. YUHASZ: I don't know if it's where most of</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>25</p> <p>1 them reside. I mean, it's --</p> <p>2 MR. ROBERTSON: Okay.</p> <p>3 MR. STAFFORD: Mr. Robertson, I'll just go</p> <p>4 ahead and tell you, Novant grew over time.</p> <p>5 MR. YUHASZ: Right.</p> <p>6 MR. STAFFORD: The hospital here, which has a</p> <p>7 large number of employees both in separate practice</p> <p>8 there and also one in Charlotte is a very large</p> <p>9 system and over time they've acquired others in</p> <p>10 other places. So that's probably why he's</p> <p>11 hesitating, but there's certainly a couple of</p> <p>12 gravitational points there.</p> <p>13 MR. ROBERTSON: Appreciate it.</p> <p>14 The point of my question, though, was the</p> <p>15 requisition self-servicing is available to employees</p> <p>16 at a variety of locations; is that right?</p> <p>17 MR. YUHASZ: Correct.</p> <p>18 MR. ROBERTSON: It's part of a networked</p> <p>19 capability that is available to -- to more than 1800</p> <p>20 Novant employees?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. ROBERTSON: Okay. And I would assume that</p> <p>23 certain authorizations are required in order to be</p> <p>24 someone who has the ability to employ the</p> <p>25 requisition self-service capability, correct?</p>	<p>27</p> <p>1 MR. YUHASZ: After you are signed onto the</p> <p>2 Novant network, correct.</p> <p>3 MR. ROBERTSON: So once I'm authorized, if I'm</p> <p>4 an employee sitting in Charlotte at the -- a Novant</p> <p>5 facility, I can access it from my -- my laptop or my</p> <p>6 desktop and -- and go through the requisition</p> <p>7 process; is that right?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: And I assume that even if I'm</p> <p>10 authorized, I may need some supervisory clearance to</p> <p>11 do certain purchasing. Would that be fair to say?</p> <p>12 MR. YUHASZ: For requisition self-service, the</p> <p>13 electronic version, if we have established the item</p> <p>14 for ordering, and they can only order electronically</p> <p>15 established items, then they're available for order</p> <p>16 and -- and do not meet under the approvals.</p> <p>17 MR. ROBERTSON: Okay. Is there any thresholds</p> <p>18 that, you know, I might not be able to exceed as</p> <p>19 someone authorized to used requisition self-service</p> <p>20 dollar threshold?</p> <p>21 MR. YUHASZ: No, we do not put dollar</p> <p>22 thresholds.</p> <p>23 MR. ROBERTSON: Sort of broad question, what's</p> <p>24 the general purpose that Novant is employing this</p> <p>25 requisition self-service application? Is it</p>
<p>26</p> <p>1 MR. YUHASZ: Correct.</p> <p>2 MR. ROBERTSON: Do you supervise who has access</p> <p>3 to it?</p> <p>4 MR. YUHASZ: In that I work with the</p> <p>5 information technology group to a setup -- to</p> <p>6 establish the security classes for Lawson, but</p> <p>7 Novant has a user access group that once you</p> <p>8 establish the security group for an application or</p> <p>9 security groups for an application, then managers</p> <p>10 can request employees have access to those security</p> <p>11 groups.</p> <p>12 MR. ROBERTSON: And the Lawson requisition</p> <p>13 service -- self-service functionality that Lawson</p> <p>14 provides has the capability to authorize certain</p> <p>15 people to have access to the application; is that</p> <p>16 right?</p> <p>17 MR. YUHASZ: Correct.</p> <p>18 MR. ROBERTSON: To simplify it, you could turn</p> <p>19 it on for some people and turn it off for others; is</p> <p>20 that right?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. ROBERTSON: If I'm one of these 1800</p> <p>23 employees at Novant of this networked application,</p> <p>24 can I access it just from my laptop like you are</p> <p>25 doing for me here today?</p>	<p>28</p> <p>1 purchase items for Novant, purchase items for Novant</p> <p>2 customers, or -- or both?</p> <p>3 MR. YUHASZ: What do you mean by "Novant</p> <p>4 customers"?</p> <p>5 MR. ROBERTSON: Well, you know, you want to</p> <p>6 sell a product to one of Novant's customers and you</p> <p>7 want to source it from another vendor. Can you use</p> <p>8 the requisition self-service to do that?</p> <p>9 MR. YUHASZ: But, I guess, clarify "Novant</p> <p>10 customers." What are you -- what's a Novant</p> <p>11 customer to you? I'm not --</p> <p>12 MR. ROBERTSON: You sell product, isn't that</p> <p>13 right, Novant does?</p> <p>14 MR. YUHASZ: No.</p> <p>15 MR. ROBERTSON: You just acquire products?</p> <p>16 MR. YUHASZ: Right, we just acquire products --</p> <p>17 MR. ROBERTSON: -- for use --</p> <p>18 MR. YUHASZ: For use by Novant.</p> <p>19 MR. ROBERTSON: Okay. Do you do it for</p> <p>20 Novant's daily operations? That is, you know, we</p> <p>21 talked about office supplies before, you know,</p> <p>22 people need pencils and pens and -- and Post-its?</p> <p>23 Do you employ the requisition self-service for that,</p> <p>24 for the daily operations?</p> <p>25 MR. YUHASZ: For daily operations but not for</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>29</p> <p>1 office supplies.</p> <p>2 MR. ROBERTSON: Okay. What types of daily</p> <p>3 operations do you employ the requisition</p> <p>4 self-service to purchase goods?</p> <p>5 MR. YUHASZ: Mostly for med/surge products.</p> <p>6 MR. ROBERTSON: When you say "med/surge,"</p> <p>7 that's medical and surgical?</p> <p>8 MR. YUHASZ: Medical and surgical.</p> <p>9 MR. ROBERTSON: Okay. Before we started the</p> <p>10 deposition, we talked about the number of vendors</p> <p>11 that are available to Novant for purchasing product.</p> <p>12 Could you tell me just on the record approximately</p> <p>13 how many you think that is?</p> <p>14 MR. YUHASZ: It would be an estimate of about</p> <p>15 10,000 for -- for procurement purposes.</p> <p>16 MR. ROBERTSON: Okay. Is that consistent,</p> <p>17 Ms. Williams, with your understanding?</p> <p>18 MS. WILLIAMS: Yes, it is.</p> <p>19 (EXHIBIT NUMBER N1 WAS MARKED FOR IDENTIFICATION.)</p> <p>20 MR. ROBERTSON: Okay. Let me show you what</p> <p>21 I've marked as Exhibit -- call it Novant Exhibit</p> <p>22 Number 1. This is, I'll represent to you, a</p> <p>23 subpoena that we served on Novant. Have you had an</p> <p>24 opportunity to see this document before?</p> <p>25 MR. YUHASZ: Yes.</p>	<p>31</p> <p>1 these topics. Are you -- understand that?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Okay. I don't want to go</p> <p>4 through and read each one for the record, but is</p> <p>5 there any topic here that you feel that -- that</p> <p>6 you're not going to be capable of testifying about</p> <p>7 today? Take a minute to go through them.</p> <p>8 MR. YUHASZ: Probably in number 4, the</p> <p>9 supplier/vendor catalogs.</p> <p>10 MR. ROBERTSON: And what gives you hesitation</p> <p>11 about supplier/vendor catalogs in topic number 4?</p> <p>12 MR. YUHASZ: Just my interpretation of that is</p> <p>13 like used in punch-out functionality where a vendor</p> <p>14 provides a catalog specific to Novant for ordering</p> <p>15 and that that, you know -- you make -- they make</p> <p>16 available for Novant requisitioners.</p> <p>17 MR. ROBERTSON: So that's based on what your</p> <p>18 understanding is of a vendor catalog?</p> <p>19 MR. YUHASZ: Uh-huh.</p> <p>20 MR. ROBERTSON: Does -- do the items that are</p> <p>21 available through the requisition self-service</p> <p>22 application provided by Lawson have textual</p> <p>23 descriptions about them?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Okay. Do they sometimes</p>
<p>30</p> <p>1 MR. STAFFORD: Take a moment, look it over.</p> <p>2 MR. ROBERTSON: Yeah, by all means --</p> <p>3 MR. STAFFORD: I believe there were two</p> <p>4 subpoenas served; is that right?</p> <p>5 MR. ROBERTSON: Well, just --</p> <p>6 MR. STAFFORD: Or maybe one served twice.</p> <p>7 Forgive me.</p> <p>8 MR. ROBERTSON: What I want to direct you to,</p> <p>9 Mr. Yuhasz, if you have an opportunity, there's a</p> <p>10 Schedule A in here, and there's a Schedule B, and</p> <p>11 then there's a Schedule C. And I apologize the</p> <p>12 document's not -- pages aren't numbered, so you have</p> <p>13 to just flip through to get to Schedule A. Let's</p> <p>14 start with that.</p> <p>15 MR. YUHASZ: I have A.</p> <p>16 MR. ROBERTSON: These are topics that my</p> <p>17 client, ePlus, identified for purposes of the</p> <p>18 deposition today. Did you have an opportunity to</p> <p>19 look at those? There's some ten topics.</p> <p>20 MR. YUHASZ: Correct --</p> <p>21 MR. ROBERTSON: Okay.</p> <p>22 MR. YUHASZ: -- yes, I have reviewed.</p> <p>23 MR. ROBERTSON: And you understand this is a --</p> <p>24 a corporate deposition of Novant, and Novant has</p> <p>25 designated you to testify with respect to some of</p>	<p>32</p> <p>1 include part numbers?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: They include perhaps vendor or</p> <p>4 manufacturer numbers?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Do they sometimes have images</p> <p>7 of the item?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: Do they have pricing</p> <p>10 availability?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: Do they ever have inventory</p> <p>13 availability?</p> <p>14 MR. YUHASZ: Yes.</p> <p>15 MR. ROBERTSON: Okay. So if we were to look</p> <p>16 at -- and we will do this later --</p> <p>17 MR. YUHASZ: Uh-huh.</p> <p>18 MR. ROBERTSON: -- search for a particular</p> <p>19 item --</p> <p>20 MR. YUHASZ: Uh-huh.</p> <p>21 MR. ROBERTSON: -- some or all of those -- that</p> <p>22 information are available to me with respect to a</p> <p>23 particular item, correct?</p> <p>24 MR. YUHASZ: Correct.</p> <p>25 MR. ROBERTSON: Does it tell me who the vendor</p>

<p>33</p> <p>1 is?</p> <p>2 MR. YUHASZ: Certain inquiries do.</p> <p>3 MR. ROBERTSON: Okay. So I can search by</p> <p>4 vendor as one of the criteria?</p> <p>5 MR. YUHASZ: On certain forms, yes.</p> <p>6 MR. ROBERTSON: Okay. You are familiar with</p> <p>7 catalogs, correct?</p> <p>8 MR. YUHASZ: Right.</p> <p>9 MR. ROBERTSON: Just generally catalogs like</p> <p>10 the Sears catalog, right?</p> <p>11 MR. YUHASZ: Right.</p> <p>12 MR. ROBERTSON: Okay. Or the Victoria's Secret</p> <p>13 catalog, my favorite. The catalog -- the Sears</p> <p>14 catalog has textual descriptions about the item,</p> <p>15 correct?</p> <p>16 MR. YUHASZ: (Nods head.)</p> <p>17 MR. ROBERTSON: You have to answer verbally --</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Okay. And it has pictures?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: And it has part numbers</p> <p>22 sometimes?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: And it has pricing information?</p> <p>25 MR. YUHASZ: Yes.</p>	<p>35</p> <p>1 MR. ROBERTSON: You want to call it an item</p> <p>2 master, but why don't you answer this for me.</p> <p>3 MR. YUHASZ: Okay.</p> <p>4 MR. ROBERTSON: You have a vendor that has</p> <p>5 perhaps hundreds of thousands of products that it's</p> <p>6 offering, correct?</p> <p>7 MR. YUHASZ: Uh-huh, yeah.</p> <p>8 MR. ROBERTSON: And all that data is loaded in</p> <p>9 the item master and available to a Novant user,</p> <p>10 correct?</p> <p>11 MR. YUHASZ: No. What we choose to load to the</p> <p>12 item master of the entire data. That's why -- it's</p> <p>13 what we choose to add ourselves to item master --</p> <p>14 MR. ROBERTSON: All right. Okay. So you've</p> <p>15 chosen to include for a particular vendor thousands</p> <p>16 of items that are available that include all the</p> <p>17 information that we've just been discussing,</p> <p>18 correct?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: Okay. And why don't you tell</p> <p>21 me why you think that's different, for example, of</p> <p>22 me choosing to select 400 pages out of 1,000-page</p> <p>23 Sears catalog to download and include that data as</p> <p>24 part of my requisition self-service application.</p> <p>25 What's the difference to you, sir?</p>
<p>34</p> <p>1 MR. ROBERTSON: And might tell you when it's</p> <p>2 available or -- or, you know, it -- whether it's a</p> <p>3 seasonal catalog or something like that?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Okay. So a lot of the</p> <p>6 information that's available to a Novant user of the</p> <p>7 requisition self-service, all that data we just</p> <p>8 talked about, is the same kind of data that's</p> <p>9 available in a catalog; isn't that right?</p> <p>10 MR. YUHASZ: Correct.</p> <p>11 MR. ROBERTSON: So if I were to basically</p> <p>12 suggest to you that the same kind of data that's</p> <p>13 available from a vendor -- multiple vendors in the</p> <p>14 Novant system is the same kind of data that's</p> <p>15 available in a catalog, would that affect your</p> <p>16 understanding as to whether or not you could testify</p> <p>17 as to the vendor/supplier catalogs available on the</p> <p>18 Novant requisition self-service?</p> <p>19 MR. YUHASZ: I guess my definition still of all</p> <p>20 that stuff you described and the way we're using it</p> <p>21 is the item master and associated file, so it's not</p> <p>22 just a vendor catalog. It's the entire item master</p> <p>23 Novant employees have put the data into.</p> <p>24 MR. ROBERTSON: I understand.</p> <p>25 MR. YUHASZ: So --</p>	<p>36</p> <p>1 MR. YUHASZ: Well, the difference is in the</p> <p>2 wording of supplier/vendor catalogs that to me</p> <p>3 infers you are using a -- a format, a data structure</p> <p>4 that the supplier maintains and -- and provides to</p> <p>5 you that you access.</p> <p>6 MR. ROBERTSON: Well, let's just talk about,</p> <p>7 for example, pricing information for a particular</p> <p>8 vendor --</p> <p>9 MR. YUHASZ: Okay. Okay. Uh-huh.</p> <p>10 MR. ROBERTSON: Where did Novant get that</p> <p>11 information from? The vendor supplied it; is that</p> <p>12 right?</p> <p>13 MR. YUHASZ: The manufacturer supplies that</p> <p>14 contract price, correct.</p> <p>15 MR. ROBERTSON: Okay. And the description of</p> <p>16 the good, whatever the item is from that</p> <p>17 manufacturer or vendor, the vendor provided that,</p> <p>18 correct?</p> <p>19 MR. YUHASZ: They provide a description. It</p> <p>20 may not be the description shown in the item master.</p> <p>21 MR. ROBERTSON: Okay. But you get descriptions</p> <p>22 of the goods from the manufacturers, right?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. ROBERTSON: The availability of whether or</p> <p>25 not that item is available to be sold, the</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>37</p> <p>1 manufacturer, the vendor provides that, right?</p> <p>2 MR. YUHASZ: What do you mean by "availability"</p> <p>3 there?</p> <p>4 MR. ROBERTSON: Whether -- whether the product</p> <p>5 is available for sale.</p> <p>6 MR. YUHASZ: No, we do not have that in the</p> <p>7 system. As -- as far as what quantity they have on</p> <p>8 hand, available to order at a certain moment?</p> <p>9 MR. ROBERTSON: When it might be available,</p> <p>10 when it's -- if it's, you know, a product that</p> <p>11 starts for sale at a certain period of time, don't</p> <p>12 have information?</p> <p>13 MR. YUHASZ: We have -- when we contracted,</p> <p>14 we -- when we've contracted began ordering that --</p> <p>15 that item from them, but we don't have their stock</p> <p>16 on hand availability readily available in our</p> <p>17 system, and that -- that's pointing out to a little</p> <p>18 bit of difference that that would probably be</p> <p>19 available on a true supplier/vendor catalog.</p> <p>20 MR. ROBERTSON: Okay. Why don't you look at</p> <p>21 Schedule B of Exhibit 1, if you could, which is the</p> <p>22 document request.</p> <p>23 MR. YUHASZ: Okay.</p> <p>24 MR. ROBERTSON: Have you had an opportunity to</p> <p>25 see this before today?</p>	<p>39</p> <p>1 MR. YUHASZ: No.</p> <p>2 MR. ROBERTSON: Were -- can you tell me the</p> <p>3 departments or divisions that they were -- where</p> <p>4 they work?</p> <p>5 MR. YUHASZ: Information technology.</p> <p>6 MR. ROBERTSON: Okay. And do you know whether</p> <p>7 or not that included the current contract that</p> <p>8 Novant has with Lawson?</p> <p>9 MR. YUHASZ: Correct.</p> <p>10 MR. ROBERTSON: Okay. When -- you indicated</p> <p>11 that prior to the license for the requisition</p> <p>12 self-service Novant had a contract with Lawson for</p> <p>13 ERP, correct?</p> <p>14 MR. YUHASZ: Correct.</p> <p>15 MR. ROBERTSON: And as part of that ERP suite</p> <p>16 of software solutions, you indicated that you did</p> <p>17 have some requisitioning capability?</p> <p>18 MR. YUHASZ: Correct.</p> <p>19 MR. ROBERTSON: Okay. Do you know what</p> <p>20 particular software that was called?</p> <p>21 MR. YUHASZ: It's called requisition in -- in</p> <p>22 the ERP. It's a requisition module.</p> <p>23 MR. ROBERTSON: Okay. And you've indicated</p> <p>24 that you believe you first licensed that ERP</p> <p>25 software suite of solutions sometime in 1999; was</p>
<p>38</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: Okay. Did you assist in any</p> <p>3 way in collecting documents that were responsive to</p> <p>4 these eight requests, sir?</p> <p>5 MR. YUHASZ: Yes, I assisted John in</p> <p>6 identifying the parties that could provide the</p> <p>7 documentation needed.</p> <p>8 MR. ROBERTSON: And by "John," you mean</p> <p>9 Mr. Morris here?</p> <p>10 MR. YUHASZ: John Morris, yes.</p> <p>11 MR. ROBERTSON: And then after you identified</p> <p>12 the individuals who might have documents that were</p> <p>13 responsive, did you assist at all in the collection?</p> <p>14 MR. YUHASZ: No.</p> <p>15 MR. ROBERTSON: Okay. Did you review the</p> <p>16 documents that were collected and provided pursuant</p> <p>17 to the subpoena?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Okay. How -- approximately how</p> <p>20 many individuals did you identify that you thought</p> <p>21 would have responsive documents?</p> <p>22 MR. YUHASZ: Right now I'm thinking it's six to</p> <p>23 eight individuals.</p> <p>24 MR. ROBERTSON: Were they all in this supply</p> <p>25 chain group for Novant?</p>	<p>40</p> <p>1 that correct?</p> <p>2 MR. YUHASZ: Correct.</p> <p>3 MR. ROBERTSON: Okay. Do you know if Novant</p> <p>4 had any requisition and procurement capability prior</p> <p>5 to 1999?</p> <p>6 MR. STAFFORD: Object to form. Go ahead.</p> <p>7 MR. YUHASZ: That is going to be difficult for</p> <p>8 me to answer because there was individual entities.</p> <p>9 They weren't -- you know, we were merging all at</p> <p>10 that time also, so there may have been some entities</p> <p>11 that had some software capabilities in that area</p> <p>12 but --</p> <p>13 MR. ROBERTSON: Prior to Novant licensing the</p> <p>14 ERP software solutions, do you know if Novant had</p> <p>15 any other ERP software provider? And specifically</p> <p>16 I'm looking for if you know the name of any software</p> <p>17 provider that was --</p> <p>18 MR. YUHASZ: Again, timing here of years.</p> <p>19 MR. ROBERTSON: Sure.</p> <p>20 MR. YUHASZ: The only one I can think of that</p> <p>21 had an ERP per se would have been Thomasville</p> <p>22 Medical Center as a part of Novant. I don't know</p> <p>23 exactly when they came onboard, but they had ESS</p> <p>24 or -- or something of that nature.</p> <p>25 MR. ROBERTSON: Okay. Do you know who else may</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>41</p> <p>1 have assisted in collecting documents that are</p> <p>2 responsive to the subpoena besides yourself</p> <p>3 identifying these six or eight individuals?</p> <p>4 MR. YUHASZ: The actual individuals that</p> <p>5 provided the documents --</p> <p>6 MR. ROBERTSON: I -- I don't want to go through</p> <p>7 their names.</p> <p>8 MR. YUHASZ: Oh.</p> <p>9 MR. ROBERTSON: I just want to know if there</p> <p>10 was anybody else -- you identified six or eight</p> <p>11 people to Mr. Morris and then documents collected.</p> <p>12 Other than those six or eight individuals, do you</p> <p>13 know if anybody else was involved in the collection</p> <p>14 process, like Ms. Williams, for example?</p> <p>15 MR. YUHASZ: Well, she was --</p> <p>16 MR. ROBERTSON: One of the six to eight --</p> <p>17 MR. YUHASZ: -- one of the six to eight</p> <p>18 individuals, yes.</p> <p>19 MR. ROBERTSON: Okay. Anybody else that you</p> <p>20 are aware of that might have been involved in the</p> <p>21 process?</p> <p>22 MR. YUHASZ: No.</p> <p>23 MR. ROBERTSON: Okay.</p> <p>24 MR. YUHASZ: Just --</p> <p>25 MR. ROBERTSON: Were those six to eight people</p>	<p>43</p> <p>1 redactions of -- of some of the pricing information</p> <p>2 because that could be proprietary to some of the</p> <p>3 vendors that -- that you utilize; is that right?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Okay.</p> <p>6 MR. STAFFORD: Mr. Robertson, let me just</p> <p>7 interject so I don't interrupt you the rest of the</p> <p>8 day. Just I think I want it on the record that</p> <p>9 consistent with our discussion this morning and my</p> <p>10 discussion on November 5th with Mr. Young of your</p> <p>11 firm, what we will propose to do is we'll ask that</p> <p>12 none of the counsel here take any notes of pricing,</p> <p>13 and I don't think -- it's my understanding that that's</p> <p>14 not an issue in your suit and that -- that the</p> <p>15 videographer and the court reporter will not take</p> <p>16 down or capture any pricing information but when the</p> <p>17 deposition adjourns, if you want screen shots, we</p> <p>18 will provide those to you with those prices</p> <p>19 redacted. If that's sufficient to you, I'll be</p> <p>20 quiet.</p> <p>21 MR. ROBERTSON: I just want to understand</p> <p>22 because typically what we do is when we're</p> <p>23 navigating through these pages you can actually</p> <p>24 track the mouse as it goes and clicks on certain</p> <p>25 links that provide the functionality. Is that true?</p>
<p>42</p> <p>1 all residents here in Winston-Salem?</p> <p>2 MR. YUHASZ: Okay.</p> <p>3 MR. ROBERTSON: What other facilities did you</p> <p>4 cause to have documents collected from?</p> <p>5 MR. YUHASZ: One individual is in the</p> <p>6 information technology office in South Carolina.</p> <p>7 MR. ROBERTSON: Okay. I just wanted you to</p> <p>8 take a look at Schedule C that's part of Exhibit 1,</p> <p>9 which is a request for certain inspections. This</p> <p>10 has to do with providing a sort of demonstration of</p> <p>11 the Lawson electronic sourcing or what's called</p> <p>12 requisition self-service capability. Do you see</p> <p>13 that?</p> <p>14 MR. YUHASZ: Yes.</p> <p>15 MR. ROBERTSON: And -- and you're going to be</p> <p>16 able to do that today; is that right?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: And what we're going to do as</p> <p>19 we go through the process is we are going to be</p> <p>20 capturing screen shots as -- as we do this. Is that</p> <p>21 your understanding?</p> <p>22 MR. YUHASZ: Yes --</p> <p>23 MR. STAFFORD: Object to form.</p> <p>24 MR. ROBERTSON: Okay. And I understand from</p> <p>25 counsel that we're going to have to do some</p>	<p>44</p> <p>1 MR. YUHASZ: Correct.</p> <p>2 MR. ROBERTSON: Okay. I guess my concern is</p> <p>3 the static screen shots are not going to permit me</p> <p>4 to actually demonstrate how it's navigated, which is</p> <p>5 kind of -- which is important to the litigation.</p> <p>6 How are we capturing these screen shots? The</p> <p>7 videographer?</p> <p>8 MR. STAFFORD: No. We have told the</p> <p>9 videographer that we cannot permit realtime capture</p> <p>10 of the screen shots today. We're happy for you all</p> <p>11 orally to capture on the written record where the</p> <p>12 mouse is landing and what's being clicked, and again</p> <p>13 we'll give you screen shots later.</p> <p>14 MR. ROBERTSON: How are we -- what I'm curious</p> <p>15 is to how are we then preserving these screen shots?</p> <p>16 What's the capability -- I mean, are we printing</p> <p>17 them out simultaneously and redacting?</p> <p>18 MR. STAFFORD: No.</p> <p>19 MR. ROBERTSON: How is it going to get</p> <p>20 captured?</p> <p>21 MR. STAFFORD: I don't know.</p> <p>22 MR. YUHASZ: The process is to do a print</p> <p>23 screen, and then you paste that to a Word document,</p> <p>24 and you print the Word document of your screens.</p> <p>25 MR. ROBERTSON: Okay. So you're going to be</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>45</p> <p>1 able to do that?</p> <p>2 MR. YUHASZ: Correct.</p> <p>3 MR. STAFFORD: It will not -- I don't think</p> <p>4 what he said, though, will capture where the mouse</p> <p>5 landed during your questioning; is that correct?</p> <p>6 MR. ROBERTSON: No, I think that's right. So</p> <p>7 I'm going to have to narrate that. It may slow us</p> <p>8 down a little bit, and I'm -- certainly I'm fine</p> <p>9 with not, during my narration, identifying any</p> <p>10 pricing information, so let's avoid that.</p> <p>11 (EXHIBIT NUMBER N2 WAS MARKED FOR IDENTIFICATION.)</p> <p>12 MR. ROBERTSON: Let me show you, Mr. Yuhasz,</p> <p>13 what I've marked as Exhibit Number 2.</p> <p>14 MR. STAFFORD: Thank you, sir.</p> <p>15 MR. ROBERTSON: Take a minute to look at that.</p> <p>16 Let me ask you, have you seen that document before?</p> <p>17 (DISCUSSION OFF THE RECORD)</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: What is it, sir? You've seen</p> <p>20 it before?</p> <p>21 MR. YUHASZ: I've seen it before.</p> <p>22 MR. ROBERTSON: What is it, if you know?</p> <p>23 MR. YUHASZ: This is license agreement for the</p> <p>24 Lawson software --</p> <p>25 MR. ROBERTSON: Okay. And this one --</p>	<p>47</p> <p>1 MR. ROBERTSON: Yes.</p> <p>2 MR. YUHASZ: Okay.</p> <p>3 MR. ROBERTSON: And as part of this contract</p> <p>4 that Lawson had with Novant, you had the purchase</p> <p>5 order capability; is that right?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: And requisition capability?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: And inventory control which</p> <p>10 included warehousing. And what does that say if you</p> <p>11 can --</p> <p>12 MR. YUHASZ: Par [slash] cart.</p> <p>13 MR. ROBERTSON: What does that mean, if you</p> <p>14 know?</p> <p>15 MR. YUHASZ: We use par processing where it's</p> <p>16 like individual storage areas in the clinical areas</p> <p>17 of storage supplies.</p> <p>18 MR. ROBERTSON: You see down at the bottom on</p> <p>19 the left-hand column there's a -- several lines</p> <p>20 involving the Lawson Insight Web products. Are you</p> <p>21 with me --</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: -- at the bottom there? And</p> <p>24 one of those is Insight Internal Procurement Center.</p> <p>25 You see that?</p>
<p>46</p> <p>1 MR. YUHASZ: -- for 2002.</p> <p>2 MR. ROBERTSON: Well, if you look at the page</p> <p>3 that ends with the number at the lower right-hand</p> <p>4 corner 0736 --</p> <p>5 MR. YUHASZ: Okay. Oh, '98 --</p> <p>6 MR. ROBERTSON: Does this appear it was entered</p> <p>7 into sometime in 1998?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: Okay. And this would be the</p> <p>10 original ERP contract that you were talking about</p> <p>11 before?</p> <p>12 MR. YUHASZ: Correct.</p> <p>13 MR. ROBERTSON: Okay. And if you'll turn to</p> <p>14 the page that ends with the number at the lower</p> <p>15 right-hand corner that is 0741, let me know when</p> <p>16 you're there.</p> <p>17 MR. YUHASZ: I have it.</p> <p>18 MR. ROBERTSON: I'm looking at -- there's a</p> <p>19 chart there, a multi-column chart, and you see the</p> <p>20 second big box has the title "Process Suite</p> <p>21 Includes." You following me on the left-hand</p> <p>22 column?</p> <p>23 MR. YUHASZ: The procurement process suite --</p> <p>24 MR. ROBERTSON: Yes, sir.</p> <p>25 MR. YUHASZ: -- includes?</p>	<p>48</p> <p>1 MR. YUHASZ: Insight --</p> <p>2 MR. ROBERTSON: A little lower below your</p> <p>3 finger.</p> <p>4 MR. YUHASZ: Oh, okay.</p> <p>5 MR. ROBERTSON: You got that?</p> <p>6 MR. YUHASZ: Yes.</p> <p>7 MR. ROBERTSON: What is that, sir, if you know?</p> <p>8 MR. YUHASZ: It might have been the early</p> <p>9 beginnings of Web requisitioning with Lawson. I'm</p> <p>10 not --</p> <p>11 MR. ROBERTSON: Do you know if you had that</p> <p>12 capability back in the 1998 time frame? If you</p> <p>13 don't --</p> <p>14 MR. YUHASZ: I don't recall if we implemented</p> <p>15 it --</p> <p>16 MR. ROBERTSON: Okay.</p> <p>17 MR. YUHASZ: -- immediately.</p> <p>18 MR. ROBERTSON: Do you know whether or not this</p> <p>19 contract, this license agreement with Lawson --</p> <p>20 MR. YUHASZ: Uh-huh.</p> <p>21 MR. ROBERTSON: -- is still controlling?</p> <p>22 MR. YUHASZ: No, I -- I wouldn't be the</p> <p>23 authority to say that.</p> <p>24 MR. ROBERTSON: Okay. That's fine.</p> <p>25 MR. YUHASZ: No.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p style="text-align: right;">49</p> <p>1 (EXHIBIT NUMBER N3 WAS MARKED FOR IDENTIFICATION.)</p> <p>2 MR. ROBERTSON: Let me show you what I'm going</p> <p>3 to mark as -- as Novant Exhibit Number 3 and ask you</p> <p>4 to take a look at that a moment, sir. And my</p> <p>5 question is going to be, have you seen this document</p> <p>6 before?</p> <p>7 MR. YUHASZ: No, I don't think I have.</p> <p>8 MR. ROBERTSON: Okay. It's dated in the 2005</p> <p>9 time frame, and you'll see it references at</p> <p>10 Section 2.0 confirmation of services. You see that?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: And it has to do with technical</p> <p>13 assistance with RSS and portal configuration. Do</p> <p>14 you see that?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: Do you understand RSS to be</p> <p>17 this requisition self-service we've been talking</p> <p>18 about?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Okay. Are these some services</p> <p>21 that Novant contracted with Lawson to provide</p> <p>22 technical assistance for requisition self-service?</p> <p>23 MR. YUHASZ: Yes, this would coincide where</p> <p>24 I -- I -- they were involved in the initial</p> <p>25 implementation in 2005.</p>	<p style="text-align: right;">51</p> <p>1 MR. YUHASZ: This was -- as best we could</p> <p>2 determine -- was when we become owners of Rowan</p> <p>3 Regional Medical Center in Salisbury.</p> <p>4 MR. ROBERTSON: And as part of that</p> <p>5 acquisition, did -- why did you need to enter into a</p> <p>6 Lawson software customer agreement?</p> <p>7 MR. YUHASZ: Because of their number of users</p> <p>8 that they were going to use for requisition</p> <p>9 self-service, it was to increase the users.</p> <p>10 MR. ROBERTSON: So -- so as we discussed</p> <p>11 earlier, the license with Lawson is based on the</p> <p>12 number of users of the requisition self-service,</p> <p>13 right?</p> <p>14 MR. YUHASZ: Yes, yes.</p> <p>15 MR. ROBERTSON: And so as you were adding a</p> <p>16 number of users you needed to enter an add--- a</p> <p>17 contract to cover those additional users?</p> <p>18 MR. YUHASZ: Correct.</p> <p>19 MR. ROBERTSON: And that was for requisition</p> <p>20 self-service?</p> <p>21 MR. YUHASZ: For requisition self-service.</p> <p>22 MR. ROBERTSON: Do you know whether or not --</p> <p>23 as part of the upgrade to requisition self-service</p> <p>24 that occurred approximately five years ago, do you</p> <p>25 know whether Novant issued a request for a proposal</p>
<p style="text-align: right;">50</p> <p>1 MR. ROBERTSON: Okay. Thank you. That's all I</p> <p>2 have on that document, sir.</p> <p>3 (DISCUSSION OFF THE RECORD)</p> <p>4 (EXHIBIT NUMBER N4 WAS MARKED FOR IDENTIFICATION.)</p> <p>5 MR. ROBERTSON: Let me show you what's been</p> <p>6 shown as Novant Exhibit Number 4 and ask you to take</p> <p>7 a moment to look at that. And my question is going</p> <p>8 to be, have you seen that document before, sir?</p> <p>9 MR. YUHASZ: I -- I haven't seen the one with</p> <p>10 this number on it.</p> <p>11 MR. ROBERTSON: Which number are you</p> <p>12 referencing, sir?</p> <p>13 MR. YUHASZ: The bating -- the Bates number.</p> <p>14 MR. ROBERTSON: Okay. You haven't seen it with</p> <p>15 this particular Bates number --</p> <p>16 MR. YUHASZ: With this --</p> <p>17 MR. ROBERTSON: -- but you've seen a document</p> <p>18 that is identical to this without the number?</p> <p>19 MR. YUHASZ: Yeah, I think it was provided</p> <p>20 later on or something.</p> <p>21 MR. ROBERTSON: Provided by Novant to --</p> <p>22 MR. YUHASZ: Or -- or provided by and mentioned</p> <p>23 later that there was this document.</p> <p>24 MR. ROBERTSON: Okay. What do you understand</p> <p>25 the document to be, Exhibit Number 4?</p>	<p style="text-align: right;">52</p> <p>1 to Lawson, what's known as an RFP?</p> <p>2 MR. YUHASZ: No, I would not be able to recall</p> <p>3 it.</p> <p>4 MR. ROBERTSON: Never saw such a document --</p> <p>5 MR. YUHASZ: Huh-uh.</p> <p>6 MR. ROBERTSON: -- that said, we need to ask</p> <p>7 you some questions about the functionality of your</p> <p>8 requisition self-service?</p> <p>9 MR. YUHASZ: I -- I can't say I'd be familiar</p> <p>10 with one.</p> <p>11 MR. ROBERTSON: Okay. When you were upgrading</p> <p>12 to the requisition self-service and adding that</p> <p>13 application to the capability, did you personally</p> <p>14 meet with anybody at Lawson to discuss or understand</p> <p>15 what function and features it was going to have?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Okay. Do you recall who that</p> <p>18 individual might have been?</p> <p>19 MR. YUHASZ: No, I don't know the name.</p> <p>20 MR. ROBERTSON: Did you only meet with that</p> <p>21 individual on one occasion?</p> <p>22 MR. YUHASZ: No.</p> <p>23 MR. ROBERTSON: Met on multiple occasions as</p> <p>24 the -- as the software is being implemented?</p> <p>25 MR. YUHASZ: Correct.</p>

<p>53</p> <p>1 MR. ROBERTSON: Okay. And I may have asked</p> <p>2 this question. I apologize, but did you tell me how</p> <p>3 long approximately that initial implementation took?</p> <p>4 MR. YUHASZ: I -- it's difficult for me to</p> <p>5 parse out just the -- the requisition self-service</p> <p>6 because it was a part of a larger upgrade.</p> <p>7 MR. ROBERTSON: Okay. How long did the entire</p> <p>8 upgrade, then, take? Was it a number of months?</p> <p>9 MR. YUHASZ: Oh, yes. Oh, yes.</p> <p>10 MR. ROBERTSON: Was it more than a year?</p> <p>11 MR. YUHASZ: I don't think it was more than a</p> <p>12 year.</p> <p>13 MR. ROBERTSON: Okay. We've been going for a</p> <p>14 little bit more than an hour. Why don't we take a</p> <p>15 short break. I'll try to get some documents</p> <p>16 organized. We'll go through those documents, and</p> <p>17 then we'll move on to that demonstration if we can.</p> <p>18 VIDEO TECHNICIAN: Going off the record, the</p> <p>19 time at 9:38.,</p> <p>20 (RECESS TAKEN)</p> <p>21 VIDEO TECHNICIAN: We're back on the record.</p> <p>22 The time is 09:51.,</p> <p>23 (EXHIBIT NUMBER N5 WAS MARKED FOR IDENTIFICATION.)</p> <p>24 MR. ROBERTSON: Mr. Yuhasz, let me hand you</p> <p>25 what has been marked as Exhibit Number 5 and ask you</p>	<p>55</p> <p>1 including application consulting --</p> <p>2 MR. YUHASZ: Uh-huh.</p> <p>3 MR. ROBERTSON: -- correct?</p> <p>4 MR. YUHASZ: Correct.</p> <p>5 MR. ROBERTSON: And technical consulting,</p> <p>6 correct?</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: And there's also client site</p> <p>9 training, correct?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: And there's a Lawson site</p> <p>12 classroom training. Do you see that?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: And then there's the Lawson</p> <p>15 Implementor. Do you see that?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Okay. Let me ask you, do you</p> <p>18 know with respect to the requisition self-service</p> <p>19 whether Lawson's ever provided application</p> <p>20 consulting?</p> <p>21 MR. YUHASZ: Yes, during the initial</p> <p>22 implementation.</p> <p>23 MR. ROBERTSON: Did they provide technical</p> <p>24 consulting?</p> <p>25 MR. YUHASZ: Yes, during initial</p>
<p>54</p> <p>1 to take a brief moment to look at that, if you will.</p> <p>2 And my first question is going to be, have you seen</p> <p>3 that document before, sir?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Okay. This is a document</p> <p>6 that's entitled Lawson Software, Inc., services</p> <p>7 agreement; is that right?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: And if you look at the last</p> <p>10 page, it's dated 2003; is that right?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: And is this a contract that</p> <p>13 Novant entered into with Lawson for them to provide</p> <p>14 services with respect to the software solutions it</p> <p>15 provides, including requisition self-service? See</p> <p>16 in the box on the first page says "services"?</p> <p>17 MR. YUHASZ: Well, I guess my hesitation is, I</p> <p>18 don't know that it included requisition self-service</p> <p>19 at that time.</p> <p>20 MR. ROBERTSON: Okay. Do you think this was</p> <p>21 with respect to the ERP solutions?</p> <p>22 MR. YUHASZ: That would be my -- that would be</p> <p>23 my inclination now, yes.</p> <p>24 MR. ROBERTSON: Well, let me ask you, under</p> <p>25 that box, the services, there's a number of services</p>	<p>56</p> <p>1 implementation.</p> <p>2 MR. ROBERTSON: Have they ever provided with</p> <p>3 respect to requisition self-service client site</p> <p>4 training?</p> <p>5 MR. YUHASZ: Yes, during implementation.</p> <p>6 MR. ROBERTSON: And did they ever provide with</p> <p>7 respect to requisition self-service Lawson site</p> <p>8 classroom training?</p> <p>9 MR. YUHASZ: In my understanding, that would be</p> <p>10 meaning at a Lawson facility?</p> <p>11 MR. ROBERTSON: Well, let's start with that.</p> <p>12 MR. YUHASZ: For our -- for requisition</p> <p>13 self-service, we never sent anyone to Lawson</p> <p>14 facility for training.</p> <p>15 MR. ROBERTSON: Have they ever come here to</p> <p>16 provide some sort of classroom training?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: Okay. Was that part of the</p> <p>19 initial implementation?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: All right. Have they done it</p> <p>22 since that initial implementation?</p> <p>23 MR. YUHASZ: No.</p> <p>24 MR. ROBERTSON: You indicated as part of the</p> <p>25 services that Lawson provides they also provide you</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>57</p> <p>1 with access to written materials; is that right?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Okay. And did I understand you</p> <p>4 to say that there's also a representative that's</p> <p>5 available by telephone if there were questions with</p> <p>6 respect to the requisition self-service?</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: Is there also an online</p> <p>9 capability to communicate with Lawson with respect</p> <p>10 to questions regarding requisition self-service?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: Do you know if you've utilized</p> <p>13 either of those two services that Lawson provides</p> <p>14 with respect to requisition self-service?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: And no -- and so is the answer,</p> <p>17 they have?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Okay. That's all I have on</p> <p>20 that document, sir.</p> <p>21 (EXHIBIT NUMBER N6 WAS MARKED FOR IDENTIFICATION.)</p> <p>22 MR. ROBERTSON: Let me show you what I have</p> <p>23 marked as Novant Exhibit 6 and ask you to take a</p> <p>24 look at that, if you will, for a minute. My first</p> <p>25 question is going to be, have you seen this document</p>	<p>59</p> <p>1 years this has now been maintained by our supply</p> <p>2 chain educator.</p> <p>3 MR. ROBERTSON: And what's the role of the</p> <p>4 supply chain educator at Novant?</p> <p>5 MR. YUHASZ: She's to develop the education</p> <p>6 material for the supply chain technology.</p> <p>7 MR. ROBERTSON: Is this distributed to the</p> <p>8 various employees of Novant who are authorized to</p> <p>9 use requisition self-service?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: Okay. This is a handy-dandy</p> <p>12 training manual for them if they have questions as</p> <p>13 to how to navigate through the various</p> <p>14 functionalities of requisition self-service?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. ROBERTSON: Do you know whether or not you</p> <p>17 had any role initially creating the table of</p> <p>18 contents that's page 2 of Exhibit Number 6?</p> <p>19 MR. YUHASZ: Yes, in the initial.</p> <p>20 MR. ROBERTSON: Just flipping through Exhibit</p> <p>21 Number 6, this requisition self-service training</p> <p>22 manual, there are a number of screen shots. Do you</p> <p>23 see that?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Okay. Those are screen shots</p>
<p>58</p> <p>1 before?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: You know, is this a document</p> <p>4 that was created by Novant or created by Lawson?</p> <p>5 MR. YUHASZ: Created by Novant.</p> <p>6 MR. ROBERTSON: Okay. Did you have any role in</p> <p>7 the creation of this document?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: Okay. And what was that role?</p> <p>10 MR. YUHASZ: The initial build of it and a few</p> <p>11 subsequent updates.</p> <p>12 MR. ROBERTSON: Do you know if this is the most</p> <p>13 recent iteration of the document?</p> <p>14 MR. YUHASZ: Given the date, November 2009, I</p> <p>15 would say yes, and it's saying RSS 9 is after our</p> <p>16 most recent upgrade to Lawson 9.</p> <p>17 MR. ROBERTSON: Is 9 the number that Lawson</p> <p>18 assigned to the most recent upgrade?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: It's not a number that was</p> <p>21 internally developed by Novant?</p> <p>22 MR. YUHASZ: Correct.</p> <p>23 MR. ROBERTSON: Okay. So were you primarily</p> <p>24 responsible for the content of Exhibit Number 6?</p> <p>25 MR. YUHASZ: Initially, you know, back a few</p>	<p>60</p> <p>1 of the actual Lawson requisition self-service</p> <p>2 software application?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Okay. And did you have any</p> <p>5 role in capturing those screen shots?</p> <p>6 MR. YUHASZ: Only in instructing the educator</p> <p>7 to -- to provide new RSS 9 documentation as we were</p> <p>8 going through upgrade. She was a team member in the</p> <p>9 upgrade, and that was her role.</p> <p>10 MR. ROBERTSON: Do you know whether these</p> <p>11 screen shots reflect the requisition self-service</p> <p>12 number 9?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: So these have been upgraded</p> <p>15 since the initial creation of this document?</p> <p>16 MR. YUHASZ: Correct.</p> <p>17 MR. ROBERTSON: And this is the version that</p> <p>18 we're going to be looking at today; is that right?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Okay. And you're going to be</p> <p>21 capturing a number of the screen shots much like you</p> <p>22 captured them here for Exhibit Number 6; is that</p> <p>23 right?</p> <p>24 MR. YUHASZ: Correct.</p> <p>25 MR. ROBERTSON: If you look at page 2 of the</p>

<p>61</p> <p>1 document, there was a table of contents. Do you see</p> <p>2 that?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: About halfway down there's a</p> <p>5 functionality that appears at page 15, I gather, of</p> <p>6 this document called "search catalog." Do you see</p> <p>7 that?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: Is that capability enabled in</p> <p>10 version 9 that we're going to see today?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: Okay. And right below that it</p> <p>13 says "NLC catalog." Do you see that?</p> <p>14 MR. YUHASZ: Yes.</p> <p>15 MR. ROBERTSON: What does NLC stand for?</p> <p>16 MR. YUHASZ: Novant Logistics Center. It's our</p> <p>17 distribution center for our inventory items.</p> <p>18 MR. ROBERTSON: Okay. Those are items that</p> <p>19 Novant's already purchased that it might utilize; is</p> <p>20 that right?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Are those items they purchased</p> <p>23 from their outside vendors?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Why do you call it a catalog?</p>	<p>63</p> <p>1 respect to that document. One other question, with</p> <p>2 respect to creation of that document, did -- did</p> <p>3 Lawson assist you at all in putting that together?</p> <p>4 MR. YUHASZ: No.</p> <p>5 (EXHIBIT NUMBER N7 WAS MARKED FOR IDENTIFICATION.)</p> <p>6 MR. ROBERTSON: Let me show you what I'm going</p> <p>7 to mark as Novant Exhibit Number 7, ask you to take</p> <p>8 a moment to look at that, sir, and my first question</p> <p>9 to you, again, is going to be, have you seen this</p> <p>10 document before?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: Okay. Is this a document that</p> <p>13 was created by Lawson or by Novant, if you know?</p> <p>14 MR. YUHASZ: By Novant.</p> <p>15 MR. ROBERTSON: Okay. And what was the purpose</p> <p>16 of creating this document?</p> <p>17 MR. YUHASZ: The purpose of this document was</p> <p>18 to meet the particular customers in our ambulatory</p> <p>19 care service line which is essentially physician</p> <p>20 practices and --</p> <p>21 MR. ROBERTSON: Was it to assist them in doing</p> <p>22 requisition?</p> <p>23 MR. YUHASZ: Yes. Well, in addition to</p> <p>24 everything else that's in here, just handling</p> <p>25 procurement in general.</p>
<p>62</p> <p>1 MR. YUHASZ: That is just the name given</p> <p>2 internally, but it's truly in -- well, that if we --</p> <p>3 if you go to page 16, you'll actually see that it is</p> <p>4 an Excel spreadsheet that we create and post on our</p> <p>5 Intranet for them to see what's available at the</p> <p>6 NLC.</p> <p>7 MR. ROBERTSON: Okay. Why don't you go to</p> <p>8 page 15 --</p> <p>9 MR. YUHASZ: Okay.</p> <p>10 MR. ROBERTSON: -- which is the search</p> <p>11 catalog --</p> <p>12 MR. YUHASZ: Right.</p> <p>13 MR. ROBERTSON: -- feature we've been</p> <p>14 discussing. Do you see that?</p> <p>15 MR. YUHASZ: Okay. Right.</p> <p>16 MR. ROBERTSON: There's -- in the Lawson RSS,</p> <p>17 there is a drop-down menu, isn't there, sir, where</p> <p>18 you can go on find [slash] shop and select to search</p> <p>19 a catalog; is that right?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: Okay. And that functionality</p> <p>22 is enabled on the RSS software we're going to see</p> <p>23 today; isn't that right?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Okay. That's all I have with</p>	<p>64</p> <p>1 MR. ROBERTSON: Okay. Did you have any role in</p> <p>2 creating this document?</p> <p>3 MR. YUHASZ: No.</p> <p>4 MR. ROBERTSON: Do you know who did author the</p> <p>5 document?</p> <p>6 MR. YUHASZ: It was provided by the director,</p> <p>7 Mike Kimbell. Now, whether he actually authored it,</p> <p>8 I'm not -- I wouldn't say, but he is the one that</p> <p>9 provided it.</p> <p>10 MR. ROBERTSON: Does Mr. Kimbell work for you?</p> <p>11 MR. YUHASZ: No.</p> <p>12 MR. ROBERTSON: Is Mr. Kimbell your supervisor?</p> <p>13 MR. YUHASZ: No.</p> <p>14 MR. ROBERTSON: Does Mr. Kimbell work in the</p> <p>15 information technology division of Novant?</p> <p>16 MR. YUHASZ: No, he --</p> <p>17 MR. ROBERTSON: Who's Mr. Kimbell --</p> <p>18 MR. YUHASZ: He works -- he's the supply chain</p> <p>19 director.</p> <p>20 MR. ROBERTSON: If you'll turn to the --</p> <p>21 there's a -- it's the third page -- fourth page of</p> <p>22 the document, and actually -- oh, there it is, the</p> <p>23 Bates number. I couldn't find it. It's the one</p> <p>24 that ends 0873. See that?</p> <p>25 MR. YUHASZ: 0873, the requisition self-service</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>65</p> <p>1 quick reference guide.</p> <p>2 MR. ROBERTSON: Right. Who created this?</p> <p>3 MR. YUHASZ: The supply chain educator.</p> <p>4 MR. ROBERTSON: Okay. This is not a -- this</p> <p>5 was not provided to you by Lawson?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: Going back to the first page of</p> <p>8 Exhibit Number 7, there's three bullet points. Do</p> <p>9 you see those?</p> <p>10 MR. YUHASZ: Correct.</p> <p>11 MR. ROBERTSON: One says -- the second bullet</p> <p>12 point is, "Lawson training." Do you see that?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Where is Lawson training</p> <p>15 reflected in this document?</p> <p>16 MR. YUHASZ: If you look on page 6 or the Bates</p> <p>17 Number 875 --</p> <p>18 MR. ROBERTSON: Right.</p> <p>19 MR. YUHASZ: -- that's just giving them a</p> <p>20 step-by-step guide as to how to complete an RSS</p> <p>21 form.</p> <p>22 MR. ROBERTSON: Did -- did Novant create this</p> <p>23 internally, or did Lawson provide this information?</p> <p>24 MR. YUHASZ: Novant created internally.</p> <p>25 MR. STAFFORD: You're talking about page 6?</p>	<p>67</p> <p>1 printout.</p> <p>2 MR. ROBERTSON: Okay. It says at the top, "Use</p> <p>3 the printout --"</p> <p>4 MR. YUHASZ: Right.</p> <p>5 MR. ROBERTSON: "-- for RSS order requisition</p> <p>6 to confirm that the items requested have been</p> <p>7 delivered"; is that right?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: So this accurately reflects a</p> <p>10 RSS requisition order when printed out using the</p> <p>11 Lawson application, right?</p> <p>12 MR. YUHASZ: Correct.</p> <p>13 MR. ROBERTSON: Okay. The next page of Exhibit</p> <p>14 Number 7 is entitled "delivery ticket." Do you see</p> <p>15 that?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Is this also -- does this</p> <p>18 reflect the form here, a printout of a delivery</p> <p>19 ticket using the Lawson RSS application?</p> <p>20 MR. YUHASZ: No.</p> <p>21 MR. ROBERTSON: What -- where -- how was this</p> <p>22 form generated?</p> <p>23 MR. YUHASZ: This form is generated in the</p> <p>24 Lawson ERP receiving module, part of the PO module</p> <p>25 of ERP.</p>
<p>66</p> <p>1 MR. YUHASZ: Page 6.</p> <p>2 MR. STAFFORD: Thank you.</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Do you think Exhibit Number 6</p> <p>5 provides an accurate guide for the operation of the</p> <p>6 Lawson requisition self-service?</p> <p>7 MR. YUHASZ: Well, it is what is used in the</p> <p>8 ambulatory care service line for -- for them to</p> <p>9 obtain goods and supplies.</p> <p>10 MR. ROBERTSON: Okay. It wasn't Novant's</p> <p>11 intent when it created this document to provide</p> <p>12 something that was misleading, correct?</p> <p>13 MR. YUHASZ: Correct.</p> <p>14 MR. ROBERTSON: Okay. You wanted to provide</p> <p>15 something that was accurate and reliable?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Okay. Let me ask you if you'd</p> <p>18 turn to the page that ends with the Bates</p> <p>19 Number 0898, page 29 of the document, says "Copy</p> <p>20 requisition at the top."</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Okay. Is this a form that's</p> <p>23 generated by the requisition self-service</p> <p>24 application?</p> <p>25 MR. YUHASZ: Yes, I believe this is the RSS</p>	<p>68</p> <p>1 MR. ROBERTSON: Part of the purchase order</p> <p>2 module?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: Okay. But if I conduct a</p> <p>5 requisition through the Lawson self-service, then</p> <p>6 the purchase order module is going to generate a</p> <p>7 delivery ticket for me; is that right?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: And this delivery ticket is as</p> <p>10 a result of that purchase order capability of the</p> <p>11 Lawson ERP system; is that right?</p> <p>12 MR. YUHASZ: And the eventual receipt of the</p> <p>13 supplies.</p> <p>14 MR. ROBERTSON: Okay. So after I've used the</p> <p>15 requisition, generated my purchase order, if the</p> <p>16 items are available from the vendor, I'll receive</p> <p>17 back this delivery ticket; is that right?</p> <p>18 MR. YUHASZ: When the -- when the supplier</p> <p>19 ships the goods to our dock.</p> <p>20 MR. ROBERTSON: I'll get a delivery ticket that</p> <p>21 reflects that the requisition item I wanted to</p> <p>22 purchase has been delivered?</p> <p>23 MR. YUHASZ: When Novant personnel receive that</p> <p>24 against that Lawson purchase order.</p> <p>25 MR. ROBERTSON: Okay. But just so we're clear,</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>69</p> <p>1 this delivery ticket is generated as a result of</p> <p>2 this purchase process?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: And it's -- and this electronic</p> <p>5 delivery ticket I can print out which is what's</p> <p>6 reflected here; is that right?</p> <p>7 MR. YUHASZ: This is not an electronic delivery</p> <p>8 ticket. This is a paper -- paper document.</p> <p>9 MR. ROBERTSON: And how -- who -- who generates</p> <p>10 that paper document?</p> <p>11 MR. YUHASZ: The individual that does the</p> <p>12 receipt.</p> <p>13 MR. ROBERTSON: Who provides the information on</p> <p>14 here as a result of my requisition? I went through</p> <p>15 the requisition process. I said I wanted to</p> <p>16 purchase the good. I'm -- it now gets delivered.</p> <p>17 Where did the information that's contained on this</p> <p>18 delivery ticket come from?</p> <p>19 MR. YUHASZ: From the original requisition</p> <p>20 entered by the user, the eventual PO committed by</p> <p>21 the buyer and then the receiver individually saying</p> <p>22 the quantity they received, so all -- all of that's</p> <p>23 involved.</p> <p>24 MR. ROBERTSON: Okay. And so, for example,</p> <p>25 after I've gone through this purchase process using</p>	<p>71</p> <p>1 right? They're not part of what the ticket looks</p> <p>2 like; is that right?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: Those are just for the</p> <p>5 instructional purposes to explain what's on the</p> <p>6 ticket, right?</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: All right. That's all I have</p> <p>9 with respect to that document.</p> <p>10 (EXHIBIT NUMBER N8 WAS MARKED FOR IDENTIFICATION.)</p> <p>11 MR. ROBERTSON: Let me show you what I'm</p> <p>12 marking as Novant Exhibit Number 8 and ask you to</p> <p>13 take a look at that, sir. Sorry. My first question</p> <p>14 is going to be, have you seen this document before?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: Is this a document that was in</p> <p>17 the possession of Novant, if you know?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Okay. The document says,</p> <p>20 "Lawson/SciQuest procure-to-pay (P2P) solutions</p> <p>21 overview for Novant Health." What's your</p> <p>22 understanding as to what the purpose of this</p> <p>23 document was?</p> <p>24 MR. YUHASZ: This was submitted as</p> <p>25 documentation from the RFP Novant sent to the choice</p>
<p>70</p> <p>1 the Lawson requisition self-service and I receive</p> <p>2 this delivery ticket, it can tell me whether or not</p> <p>3 the vendor was -- had a good that could fulfill my</p> <p>4 request; is that right?</p> <p>5 MR. YUHASZ: Correct.</p> <p>6 MR. ROBERTSON: And just looking at this</p> <p>7 delivery ticket on Exhibit 7 at page 30, there is</p> <p>8 actually a heading -- if you see about halfway down</p> <p>9 on the right-hand side -- for back ordered. Do you</p> <p>10 see that?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: And that indicates that the</p> <p>13 item wasn't available in inventory; isn't that</p> <p>14 right?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. ROBERTSON: And if you turn to the next</p> <p>17 page, there's a delivery ticket, page 2, as a result</p> <p>18 of this RSS process we're talking about, correct?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: You'll see there's a box there</p> <p>21 that says "quantity back ordered," tells you how</p> <p>22 many have been back ordered; is that right?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: Now, these boxes that are put</p> <p>25 on these, these are overlaid on the actual ticket,</p>	<p>72</p> <p>1 vendors to provide a procure-to-pay solution to</p> <p>2 Novant Health.</p> <p>3 MR. ROBERTSON: And what do you understand a</p> <p>4 procure-to-pay solution to be?</p> <p>5 MR. YUHASZ: An end-to-end solution of -- for</p> <p>6 requisitioning through payment.</p> <p>7 MR. ROBERTSON: Do you know whether or not</p> <p>8 Novant adopted a P2P, procure-to-pay, solution as a</p> <p>9 result of this RFP process?</p> <p>10 MR. YUHASZ: We did not get all the way through</p> <p>11 the P2P. We have awarded P2O, meaning</p> <p>12 procure-to-order, so the requisition and ordering --</p> <p>13 MR. ROBERTSON: Okay.</p> <p>14 MR. YUHASZ: -- we have completed.</p> <p>15 MR. ROBERTSON: Are you familiar with this</p> <p>16 company that's identified on the document Exhibit</p> <p>17 Number 8 known as SciQuest?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Do you know whether or not as a</p> <p>20 result of this RFP process SciQuest ever provided</p> <p>21 any services to Novant?</p> <p>22 MR. YUHASZ: What -- would you define the</p> <p>23 services there, what --</p> <p>24 MR. ROBERTSON: Well, let's just -- why don't</p> <p>25 you take a look at page 2 of Exhibit 8 that</p>

<p>73</p> <p>1 answered -- the Bates Number 946. Do you see that?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Do you see there appears to be</p> <p>4 two columns, one for SciQuest and one for Lawson?</p> <p>5 Do you see that?</p> <p>6 MR. YUHASZ: Yes.</p> <p>7 MR. ROBERTSON: And I would assume that the</p> <p>8 items next to the column for SciQuest were certain</p> <p>9 things that SciQuest was to do as part of this</p> <p>10 Lawson SciQuest integration P2P option number 1; is</p> <p>11 that correct?</p> <p>12 MR. YUHASZ: Yes.</p> <p>13 MR. ROBERTSON: Is that your understanding of</p> <p>14 the document?</p> <p>15 MR. YUHASZ: That's my understanding.</p> <p>16 MR. ROBERTSON: Okay. And one of the columns</p> <p>17 next to the SciQuest is a column entitled "shop."</p> <p>18 Do you see that at the top?</p> <p>19 MR. YUHASZ: Oh, yes.</p> <p>20 MR. ROBERTSON: Okay. And next to SciQuest</p> <p>21 under shop, there are a number of items there that</p> <p>22 are -- that are detailed. Are you with me?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: Okay. One of them is host --</p> <p>25 hosted catalogs. Do you see that?</p>	<p>75</p> <p>1 SciQuest to provide any services?</p> <p>2 MR. YUHASZ: We've never -- we have not. From</p> <p>3 this RFP, we did not enter into a contract with</p> <p>4 SciQuest.</p> <p>5 MR. ROBERTSON: Okay. Do you know as -- let me</p> <p>6 start over. When approximately was this RFP process</p> <p>7 underway? How long ago?</p> <p>8 MR. YUHASZ: 2008.</p> <p>9 MR. ROBERTSON: In that time frame, do you know</p> <p>10 whether or not you, Novant, was looking at any other</p> <p>11 potential solution providers besides SciQuest?</p> <p>12 MR. YUHASZ: Yes.</p> <p>13 MR. ROBERTSON: Who -- who was that?</p> <p>14 MR. YUHASZ: Ariba.</p> <p>15 MR. ROBERTSON: Okay. Do you know whether or</p> <p>16 not Novant ever submitted an RFP to my client,</p> <p>17 ePlus, as part of this process?</p> <p>18 MR. YUHASZ: Yes, we did.</p> <p>19 MR. ROBERTSON: Okay. Did ePlus provide you</p> <p>20 with information as to functionality that they can</p> <p>21 provide?</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: Okay. Do you recall what that</p> <p>24 functionality was that -- that you were looking at</p> <p>25 with respect to ePlus?</p>
<p>74</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: One is punch-out catalogs. See</p> <p>3 that?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Then there's stockroom items,</p> <p>6 correct?</p> <p>7 MR. YUHASZ: Correct.</p> <p>8 MR. ROBERTSON: And custom forms, correct?</p> <p>9 MR. YUHASZ: Yes.</p> <p>10 MR. ROBERTSON: And Lawson item master,</p> <p>11 correct?</p> <p>12 MR. YUHASZ: Correct.</p> <p>13 MR. ROBERTSON: Do you know if SciQuest ever</p> <p>14 performed or -- any of those services for Novant as</p> <p>15 part of this P2P solution you submitted an RFP for?</p> <p>16 MR. YUHASZ: In relation to just doing a</p> <p>17 demonstration?</p> <p>18 MR. ROBERTSON: Okay. Let's start with that.</p> <p>19 Did they demonstrate that capability?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: Okay. Did they ever implement</p> <p>22 that capability?</p> <p>23 MR. YUHASZ: No.</p> <p>24 MR. ROBERTSON: Okay. Do you know whether or</p> <p>25 not Novant ever entered into a contract with</p>	<p>76</p> <p>1 MR. YUHASZ: Well, it was the same for all of</p> <p>2 them. It's the RFP requirements.</p> <p>3 MR. ROBERTSON: Okay. You said you also</p> <p>4 submitted an RFP to Ariba; is that right?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: And did you ever enter in any</p> <p>7 contractual relationship with Ariba?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: And what services did Ariba</p> <p>10 provide with respect to this RFP process?</p> <p>11 MR. YUHASZ: They're providing the</p> <p>12 procure-to-order functionality.</p> <p>13 MR. ROBERTSON: Okay. Did they ever provide</p> <p>14 any hosted catalogs?</p> <p>15 MR. YUHASZ: We are -- haven't begun that</p> <p>16 implementation yet.</p> <p>17 MR. ROBERTSON: How about punch-out catalogs?</p> <p>18 Did Ariba provide any functionality with respect to</p> <p>19 that?</p> <p>20 MR. YUHASZ: Again, we have not begun that</p> <p>21 portion of the implementation, so you know, it's</p> <p>22 expected.</p> <p>23 MR. ROBERTSON: Is that Ariba implementation of</p> <p>24 that type of functionality, is it in any way linked</p> <p>25 to the Lawson procurement capability?</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>77</p> <p>1 MR. YUHASZ: In -- for use of the supplier</p> <p>2 catalogs or the purchasing or what --</p> <p>3 MR. ROBERTSON: Any -- any way, shape, or form.</p> <p>4 MR. YUHASZ: The current design is that the</p> <p>5 Ariba purchase order and receipt transactions will</p> <p>6 be copied to Lawson transactions.</p> <p>7 MR. ROBERTSON: So they will be able to</p> <p>8 communicate with each through those two</p> <p>9 applications?</p> <p>10 MR. YUHASZ: Correct.</p> <p>11 MR. ROBERTSON: With respect to the hosted</p> <p>12 catalogs and punch-out catalogs which have not been</p> <p>13 implemented yet, is it the intention of Novant to</p> <p>14 have that capability integrated with the Lawson</p> <p>15 procurement process application?</p> <p>16 MR. YUHASZ: Inasmuch as a PO is created and</p> <p>17 receipt is done for those orders using those</p> <p>18 catalogs.</p> <p>19 MR. ROBERTSON: Okay. So the Lawson</p> <p>20 application will provide for the purchase order</p> <p>21 creation and the receipt of the orders; is that</p> <p>22 right?</p> <p>23 MR. YUHASZ: No, they'll have copies of the</p> <p>24 Ariba transactions.</p> <p>25 MR. ROBERTSON: Okay. Why is it important to</p>	<p>79</p> <p>1 responsive e-mail? Is that -- does that accurately</p> <p>2 reflect the string?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: The subject is Novant Health</p> <p>5 procure-to-pay RFP. Do you see that?</p> <p>6 MR. YUHASZ: Yes.</p> <p>7 MR. ROBERTSON: Is that the same P2P RFP that</p> <p>8 we were just talking about with respect to Exhibit</p> <p>9 Number 8?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: And if you'll go to the page</p> <p>12 that ends with 0399, you'll see there's an e-mail to</p> <p>13 Pat Burton from Megan Evans. Do you see that, dated</p> <p>14 March 27, 2009?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: And Megan Evans is a Lawson</p> <p>17 employee; is that right?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: It appears here she's an</p> <p>20 account executive for the health division of Lawson?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Okay. Have you ever had any</p> <p>23 dealings with Ms. Evans?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: And it indicates here that she</p>
<p>78</p> <p>1 Novant that -- that the Lawson application have</p> <p>2 copies of the purchase order and receipt generated</p> <p>3 by the Ariba application?</p> <p>4 MR. YUHASZ: Because the invoice matching is</p> <p>5 still going to reside in Lawson finance.</p> <p>6 MR. ROBERTSON: That's all I have with that</p> <p>7 document, sir.</p> <p>8 (EXHIBIT NUMBER N9 WAS MARKED FOR IDENTIFICATION.)</p> <p>9 MR. ROBERTSON: Let me show you what I've</p> <p>10 marked as Novant Exhibit Number 9, ask you to take a</p> <p>11 look at that if you would. As for the record, it's</p> <p>12 a rather voluminous document that is -- bears the</p> <p>13 Bates Number NOV -- excuse me -- NOV0394 through</p> <p>14 0443, and it appears that the first -- the first</p> <p>15 eight pages or so is an e-mail string; is that fair</p> <p>16 to say?</p> <p>17 MR. YUHASZ: Correct.</p> <p>18 MR. ROBERTSON: And it's dated -- at least the</p> <p>19 last e-mail that appears at the top is dated</p> <p>20 March 20, 2009; is that right?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. ROBERTSON: Okay. And since it's an e-mail</p> <p>23 string, is it fair to say that the e-mail start with</p> <p>24 the last one as the first in chronological time and</p> <p>25 the last one that appears on page 1 is the last</p>	<p>80</p> <p>1 is attaching Lawson's response to Novant's request</p> <p>2 for proposal; is that right?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: And is that accurately</p> <p>5 reflected by the attachment which is -- begins at</p> <p>6 the page marked 0402 request for proposal,</p> <p>7 procure-to-pay?</p> <p>8 MR. YUHASZ: It is incomplete per John sending</p> <p>9 you the complete electronic file. I think you've --</p> <p>10 MR. ROBERTSON: Oh, I see. Yeah, the one we</p> <p>11 just recently received?</p> <p>12 MR. STAFFORD: Within the last day or so --</p> <p>13 MR. YUHASZ: Correct.</p> <p>14 MR. STAFFORD: -- we sent you an e-mail with an</p> <p>15 electronic document. For some reason when we did a</p> <p>16 printout only the first few pages showed, and we</p> <p>17 don't know why, but you've got the other one.</p> <p>18 MR. ROBERTSON: Let's just focus on this one --</p> <p>19 MR. YUHASZ: Okay.</p> <p>20 MR. ROBERTSON: -- since I have it here now.</p> <p>21 MR. YUHASZ: Okay.</p> <p>22 MR. ROBERTSON: Turn to the page that is marked</p> <p>23 0403. There's a chart that has multi-column</p> <p>24 requirement specifications; is that right?</p> <p>25 MR. YUHASZ: Yes.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>81</p> <p>1 MR. ROBERTSON: Okay. Now, this was a Novant</p> <p>2 form, but Lawson provided responses to your requests</p> <p>3 as to whether or not the software solution it was</p> <p>4 offering would have certain -- meet certain</p> <p>5 requirements; is that right?</p> <p>6 MR. YUHASZ: Yes.</p> <p>7 MR. ROBERTSON: Okay. So just to orient on the</p> <p>8 document, there's a category of -- of certain</p> <p>9 requirement specifications, correct?</p> <p>10 MR. YUHASZ: Correct.</p> <p>11 MR. ROBERTSON: And then there's a requirement</p> <p>12 description, correct?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: And then there's a column</p> <p>15 entitled "priority" which indicates whether it's</p> <p>16 important or essential to Novant or desirable.</p> <p>17 Those are the three items I see there.</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: And then there's a column that</p> <p>20 says yes, no, or not applicable. Do you see that?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: And then there's a column that</p> <p>23 has text in it. Is that a textual response by</p> <p>24 Lawson as to detailed information about its ability</p> <p>25 to meet this -- these requirement specifications?</p>	<p>83</p> <p>1 MR. YUHASZ: Correct.</p> <p>2 MR. ROBERTSON: Okay. I understand. All</p> <p>3 right. So as part of this response to your requests</p> <p>4 for proposal, in column number 3, the left, under</p> <p>5 data content management, one of the requirements was</p> <p>6 the solution shall allow collection of item</p> <p>7 repository data from multiple sources; is that</p> <p>8 right?</p> <p>9 MR. YUHASZ: Yes.</p> <p>10 MR. ROBERTSON: And that was essential to</p> <p>11 Novant?</p> <p>12 MR. YUHASZ: Yes.</p> <p>13 MR. ROBERTSON: And in response to this RFP,</p> <p>14 Lawson indicated that the solution can support</p> <p>15 content via punch-out, flat file, and level two</p> <p>16 punch-out with both aisle and item levels; is that</p> <p>17 right?</p> <p>18 MR. YUHASZ: Again, I can't say which vendor</p> <p>19 responded.</p> <p>20 MR. ROBERTSON: Okay.</p> <p>21 MR. STAFFORD: If I could help Mr. Robertson,</p> <p>22 the witness just understands, I think, that,</p> <p>23 Mr. Robertson, when he's saying Lawson provided, I</p> <p>24 think he means that regardless of who wrote that, it</p> <p>25 came through Lawson to you via the e-mails. Am I</p>
<p>82</p> <p>1 MR. YUHASZ: Well, I can't say it was Lawson</p> <p>2 individually since the RFP was to Lawson/SciQuest</p> <p>3 as -- as a partner so --</p> <p>4 MR. ROBERTSON: Well, this one is dated</p> <p>5 sometime in March 2009; is that -- is that right?</p> <p>6 Look at the e-mail string again.</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: So was -- was -- excuse me --</p> <p>9 Novant still pursuing a relationship with SciQuest</p> <p>10 in March of 2009?</p> <p>11 MR. YUHASZ: We were still in the -- the</p> <p>12 procure-to-pay evaluation project in that time</p> <p>13 frame, yes.</p> <p>14 MR. ROBERTSON: Was -- was SciQuest still part</p> <p>15 of the equation?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: Is it -- this document, does it</p> <p>18 indicate anywhere in that it came from anybody at --</p> <p>19 at SciQuest?</p> <p>20 MR. YUHASZ: Well, the only thing is in the</p> <p>21 textual responses you mentioned.</p> <p>22 MR. ROBERTSON: Where it -- I see where it</p> <p>23 says, for example, just number 8 on that page, then,</p> <p>24 0403, there is a reference to SciQuest has close</p> <p>25 relationships?</p>	<p>84</p> <p>1 right --</p> <p>2 MR. YUHASZ: Okay.</p> <p>3 MR. ROBERTSON: Yes, so with that</p> <p>4 understanding --</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: -- I just want to go through --</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: -- some of the capability --</p> <p>9 MR. YUHASZ: Yes.</p> <p>10 MR. ROBERTSON: -- that was recommended to you.</p> <p>11 MR. YUHASZ: Yeah. The combined response was</p> <p>12 delivered by Lawson.</p> <p>13 MR. ROBERTSON: And that capability indicated,</p> <p>14 for example, under column number 6, that the</p> <p>15 solution shall categorize items to UNSPSC; is that</p> <p>16 right?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: And you understand UNSPSC to be</p> <p>19 a classification system for particular items?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: Okay. And does the Lawson RSS</p> <p>22 system that we're going to see today, does that have</p> <p>23 the capability of using those UNSPSC codes?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Okay. And can I search using</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>85</p> <p>1 UNSPSC codes on the Lawson requisition --</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: -- self-service system that</p> <p>4 we're going to see today?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Do you know whether or not</p> <p>7 searches are done based on UNSPSC codes on the</p> <p>8 Lawson requisition self-service?</p> <p>9 MR. YUHASZ: My best guess would be very</p> <p>10 rarely, if done at all.</p> <p>11 MR. ROBERTSON: But it has the capability --</p> <p>12 MR. YUHASZ: It has the capability.</p> <p>13 MR. ROBERTSON: Okay. And if I search using an</p> <p>14 UNSPSC code, could I get items from multiple vendors</p> <p>15 or more than one vendor that have a particular good</p> <p>16 that meets that code?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: Will you be able to demonstrate</p> <p>19 that capability today?</p> <p>20 MR. YUHASZ: Yes, should be able to.</p> <p>21 MR. ROBERTSON: Okay. If you turn to the next</p> <p>22 page that ends 0404, particularly I'm looking at</p> <p>23 item Number 19. You with me?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: The requirement there was the</p>	<p>87</p> <p>1 MR. ROBERTSON: Says the solution shall allow</p> <p>2 items to be grouped by commodity or material code</p> <p>3 specification, e.g., UNSPSC. Do you see that?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: And Novant indicated that was</p> <p>6 essential?</p> <p>7 MR. YUHASZ: Correct.</p> <p>8 MR. ROBERTSON: And in Lawson's response, it</p> <p>9 indicated that that capability was availability; is</p> <p>10 that right?</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. ROBERTSON: And specifically it said that</p> <p>13 the user can search, find, and manage, and then it</p> <p>14 says [open parentheses] admins [closed parentheses]</p> <p>15 products via taxonomy and category searching and</p> <p>16 display. For example, a buyer can turn on [slash]</p> <p>17 off or promote categories of products by supplier.</p> <p>18 Do you see that?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Okay. And that's what Lawson</p> <p>21 represented that the solution could do?</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: Okay. The last one I want to</p> <p>24 focus on is number 30 for data management -- data</p> <p>25 content management there.</p>
<p>86</p> <p>1 solution shall provide ability to import catalog</p> <p>2 data from suppliers. Do you see that?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: And Novant indicated that this</p> <p>5 was essential?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: And in Lawson's response they</p> <p>8 indicated that, yes, the solution would have that</p> <p>9 capability?</p> <p>10 MR. YUHASZ: The combined response, yes.</p> <p>11 MR. ROBERTSON: Okay. Delivered by Lawson?</p> <p>12 MR. YUHASZ: Delivered by Lawson.</p> <p>13 MR. ROBERTSON: And it says, this is standard</p> <p>14 functionality offered to suppliers via their</p> <p>15 supplier portal. Do you see that?</p> <p>16 MR. YUHASZ: Yes.</p> <p>17 MR. ROBERTSON: And that's what Lawson</p> <p>18 represented in this document?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Delivered to you?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Okay. Why don't you turn to</p> <p>23 the next page. I want to focus on number 28, the</p> <p>24 requirement description. You with me?</p> <p>25 MR. YUHASZ: Yes.</p>	<p>88</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: The requirement description</p> <p>3 was, the solution shall allow the user to search for</p> <p>4 same item across multiple suppliers and generic</p> <p>5 versus brand name for pharmacy items. Do you see</p> <p>6 that?</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. ROBERTSON: And Novant indicated that was</p> <p>9 essential?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: And Lawson represented that the</p> <p>12 solution would have that capability, correct, under</p> <p>13 the column "yes" --</p> <p>14 MR. YUHASZ: Yes, yes.</p> <p>15 MR. ROBERTSON: Okay. And specifically, it</p> <p>16 states, all hosted and level 2 punch-out content can</p> <p>17 be searched simultaneously by end users. When the</p> <p>18 search criteria entered by the user matches multiple</p> <p>19 vendor/product offerings, all products are displayed</p> <p>20 to the end user. Do you see that?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Do you know what a level 2</p> <p>23 punch-out is?</p> <p>24 MR. YUHASZ: I couldn't define it. There is a</p> <p>25 level 1 and level 2 capability of punch-out they can</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p style="text-align: right;">89</p> <p>1 choose to use per supplier.</p> <p>2 MR. ROBERTSON: You indicated that you haven't</p> <p>3 implemented the punch-out capability yet as part of</p> <p>4 the Lawson requisition self-service; is that right?</p> <p>5 MR. YUHASZ: Correct.</p> <p>6 MR. ROBERTSON: Is it contemplated that Novant</p> <p>7 will implement the punch-out capability at some</p> <p>8 point?</p> <p>9 MR. YUHASZ: As we were going to implement</p> <p>10 procure-to-pay solution, yes.</p> <p>11 MR. ROBERTSON: But as part of their Lawson</p> <p>12 requisition self-service currently, it has that</p> <p>13 punch-out capability, you just haven't implemented</p> <p>14 it yet?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. ROBERTSON: So as sold to you and as</p> <p>17 licensed to you already, that Lawson requisition</p> <p>18 self-service has that capability, correct?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Okay. Do -- do you have any</p> <p>21 expected completion date for that implementation of</p> <p>22 the Lawson punch-out capability?</p> <p>23 MR. YUHASZ: Well, we're not going to pursue it</p> <p>24 through Lawson.</p> <p>25 MR. ROBERTSON: You pursue it through Ariba?</p>	<p style="text-align: right;">91</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: All right. Pat Burton is a</p> <p>3 Novant employee?</p> <p>4 MR. YUHASZ: Correct.</p> <p>5 MR. ROBERTSON: Okay. And was this a document</p> <p>6 that went out to several of the potential providers</p> <p>7 of the procurement solutions? Do you know?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: Are you familiar with an</p> <p>10 individual by the name of Will Thomas who's on the</p> <p>11 "to" line of this e-mail which is Exhibit Number 10?</p> <p>12 MR. YUHASZ: No, I'm --</p> <p>13 MR. ROBERTSON: So you're not familiar then it</p> <p>14 follows that Mr. Thomas is an ePlus employee?</p> <p>15 MR. YUHASZ: No.</p> <p>16 MR. ROBERTSON: Okay. Did you ever have any</p> <p>17 dealings with a Mr. Thomas from ePlus?</p> <p>18 MR. YUHASZ: We may have, you know, from e-mail</p> <p>19 strings I saw during the RFP process, but I don't</p> <p>20 recall any personal meeting that's --</p> <p>21 MR. ROBERTSON: On Exhibit Number 10, there's</p> <p>22 questions regarding specific requirements. Do you</p> <p>23 see that?</p> <p>24 MR. YUHASZ: Yes.</p> <p>25 MR. ROBERTSON: Okay. These are specific</p>
<p style="text-align: right;">90</p> <p>1 MR. YUHASZ: Correct.</p> <p>2 MR. ROBERTSON: Yeah. Let's take another short</p> <p>3 break, and then I think we'll get through maybe two</p> <p>4 or three more documents, and then we'll start the --</p> <p>5 start the show. Thank you.</p> <p>6 VIDEO TECHNICIAN: Going off the record, the</p> <p>7 time is 10:32.,</p> <p>8 (RECESS TAKEN)</p> <p>9 VIDEO TECHNICIAN: We're back on the record.</p> <p>10 The time is 10:46.,</p> <p>11 MR. ROBERTSON: Mr. Yuhasz, I've got a few more</p> <p>12 documents to go through, but I'll go through them</p> <p>13 quickly. I want you to identify them for me, if you</p> <p>14 can.</p> <p>15 MR. YUHASZ: Okay.</p> <p>16 (EXHIBIT NUMBER N10 WAS MARKED FOR IDENTIFICATION.)</p> <p>17 MR. ROBERTSON: What I want to show you is</p> <p>18 Novant Exhibit 10, appears to be an e-mail cover</p> <p>19 page, and it has an attached document to it called,</p> <p>20 "Procurement current state," and it actually bears</p> <p>21 the Bates label ePlus0911573 (sic) through 582, and</p> <p>22 ask you if you've seen that document before.</p> <p>23 MR. YUHASZ: During RFP process.</p> <p>24 MR. ROBERTSON: And that's the RFP process that</p> <p>25 we were talking about for the P2P application?</p>	<p style="text-align: right;">92</p> <p>1 requirements of Novant that Mr. Burton was --</p> <p>2 Pat Burton -- I don't know if it's a man or woman --</p> <p>3 that's identifying --</p> <p>4 MR. YUHASZ: She's a woman.</p> <p>5 MR. ROBERTSON: Okay. Ms. Burton is</p> <p>6 identifying certain requirements of Novant for the</p> <p>7 potential providers of this software application,</p> <p>8 right?</p> <p>9 MR. YUHASZ: Yes, yes.</p> <p>10 MR. ROBERTSON: Attached to this was a document</p> <p>11 titled, "Procurement, current state." Do you see</p> <p>12 that?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Did you have any role in</p> <p>15 preparing this document?</p> <p>16 MR. YUHASZ: Only probably as a reviewer. I</p> <p>17 don't -- I would say Vicky Williams provided more</p> <p>18 content on this.</p> <p>19 MR. ROBERTSON: Well, while -- while we have</p> <p>20 her here, can I ask Ms. Williams, did you provide</p> <p>21 content, or were you the author of this document</p> <p>22 which is part of Exhibit Number 10?</p> <p>23 MS. WILLIAMS: I was the author.</p> <p>24 MR. ROBERTSON: Thank you. Well, while I've</p> <p>25 got you there, was it your intention to provide an</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>93</p> <p>1 accurate reflection of Novant's current state when</p> <p>2 you created this document?</p> <p>3 MR. STAFFORD: Take a moment and look at it.</p> <p>4 Let me unhook it. Bear with me.</p> <p>5 MS. WILLIAMS: Yes, it was. I prepared the --</p> <p>6 up to page 11577, and then used flowcharts that were</p> <p>7 gathered as we started through the process before</p> <p>8 the RFP preparation.</p> <p>9 MR. ROBERTSON: Okay. And those flowcharts</p> <p>10 actually indicate or contain boxes that reference</p> <p>11 Lawson; is that right? For example, at the page</p> <p>12 that ends with the number 578, manual paper</p> <p>13 requisitions --</p> <p>14 MS. WILLIAMS: Yes, I see the reference to</p> <p>15 Lawson in the document.</p> <p>16 MR. ROBERTSON: Do you know -- I've seen</p> <p>17 similar flowcharts like this in Lawson documents.</p> <p>18 Did -- did you obtain the flowchart from a Lawson</p> <p>19 document?</p> <p>20 MS. WILLIAMS: No, sir. These documents were</p> <p>21 compiled by just meeting with end users in a room</p> <p>22 and throwing up the process flow on the wall.</p> <p>23 MR. ROBERTSON: Okay. So you created the</p> <p>24 process flow?</p> <p>25 MS. WILLIAMS: No, sir, one of our supply chain</p>	<p>95</p> <p>1 users proceed.</p> <p>2 MR. ROBERTSON: How about can you tell me</p> <p>3 approximately when you created the document? It</p> <p>4 doesn't bear a date. I don't see one anyway.</p> <p>5 MR. STAFFORD: This was attached.</p> <p>6 MS. WILLIAMS: Uh-huh.</p> <p>7 MR. ROBERTSON: Yeah, there's an e-mail if that</p> <p>8 helps you at all that contained this PowerPoint --</p> <p>9 MS. WILLIAMS: It -- it appears to be around</p> <p>10 March of '09.</p> <p>11 MR. ROBERTSON: Is that consistent with your</p> <p>12 recollection?</p> <p>13 MS. WILLIAMS: Yes.</p> <p>14 MR. ROBERTSON: Okay. That's all I have on</p> <p>15 that document. Thank you. Thank you, Ms. Williams.</p> <p>16 (EXHIBIT NUMBER N11 WAS MARKED FOR IDENTIFICATION.)</p> <p>17 MR. ROBERTSON: Let me show you what I've</p> <p>18 marked as Exhibit Number 11, ask you to take a look</p> <p>19 at that. And while you're doing that, let me just</p> <p>20 for the record indicate it's entitled Novant Health</p> <p>21 P2P Project. Appears to have a date of January 16,</p> <p>22 2009, and it's a three-page document.</p> <p>23 And my question, sir, is, have you seen</p> <p>24 this document before?</p> <p>25 MR. YUHASZ: Yes.</p>
<p>94</p> <p>1 employees at the logistics center at that time came</p> <p>2 up and worked with this document, the flows.</p> <p>3 MR. ROBERTSON: Okay. Why did that individual</p> <p>4 include Lawson as the -- as the provider in -- in</p> <p>5 the boxes and not some other software provider? Do</p> <p>6 you know?</p> <p>7 MR. STAFFORD: Mr. Robertson, are you looking</p> <p>8 at page 78 as an example of that? Is that right --</p> <p>9 MR. ROBERTSON: Yes, sir. Yeah. For example,</p> <p>10 it says, "Does part have a Lawson number? If yes,</p> <p>11 fill in Lawson number." Do you see that in the</p> <p>12 flowchart?</p> <p>13 MS. WILLIAMS: This was documenting current</p> <p>14 process flow, and since Lawson was our current user,</p> <p>15 that's all they would know to use.</p> <p>16 MR. ROBERTSON: Okay.</p> <p>17 MS. WILLIAMS: This truly was the end user</p> <p>18 sitting in a room.</p> <p>19 MR. ROBERTSON: Okay. So you think these</p> <p>20 flowcharts as created by this individual who's an</p> <p>21 Novant employee, is it accurate it will reflect the</p> <p>22 current operations and functionality of the Lawson</p> <p>23 software as of the date -- the creation of the</p> <p>24 document?</p> <p>25 MS. WILLIAMS: As of the date and as the end</p>	<p>96</p> <p>1 MR. ROBERTSON: Do you know what the purpose of</p> <p>2 the document was?</p> <p>3 MR. YUHASZ: The purpose of this document is in</p> <p>4 the project -- IT project management office doing a</p> <p>5 project they must provide a scope for -- for the</p> <p>6 project and -- and these major titles are needed to</p> <p>7 be completed by the business owner, executive</p> <p>8 business owner.</p> <p>9 MR. ROBERTSON: So this was an internal</p> <p>10 document not to be given to outside suppliers; is</p> <p>11 that right?</p> <p>12 MR. YUHASZ: Correct.</p> <p>13 MR. ROBERTSON: Okay. All right. That's all I</p> <p>14 have on that document. Thanks.</p> <p>15 (EXHIBIT NUMBER N12 WAS MARKED FOR IDENTIFICATION.)</p> <p>16 MR. ROBERTSON: Show you what I've marked as</p> <p>17 Novant Exhibit Number 12 and ask you to take a look</p> <p>18 at that. It's a very voluminous document that bears</p> <p>19 the Bates Number NOV0453 through 0697, and I don't</p> <p>20 expect you to go through every page of it, but my</p> <p>21 initial question is, have you seen the document</p> <p>22 before?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: Do you know whether this</p> <p>25 document existed in a hard copy, or was it printed</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>97</p> <p>1 out recently for purposes of responding to the</p> <p>2 subpoena?</p> <p>3 MR. YUHASZ: If the -- these documents -- and</p> <p>4 I'm going to have to defer to Vicky to answer.</p> <p>5 MR. STAFFORD: Okay. Did you hear the</p> <p>6 question?</p> <p>7 MS. WILLIAMS: Uh-huh. These documents</p> <p>8 probably existed in hard copies. These were printed</p> <p>9 off or e-mailed -- the electronic copy was e-mailed.</p> <p>10 These documents were prepared over a period of time</p> <p>11 to use for just -- by training in our department.</p> <p>12 MR. ROBERTSON: Okay. Much like the other</p> <p>13 document we saw earlier, it's just sort of the</p> <p>14 internal manual that shows people how to do --</p> <p>15 MS. WILLIAMS: Right.</p> <p>16 MR. ROBERTSON: -- go through the procurement</p> <p>17 process of requisition self-service?</p> <p>18 MS. WILLIAMS: Yes, and these are totally</p> <p>19 prepared by us.</p> <p>20 MR. ROBERTSON: And you -- you captured screen</p> <p>21 shots in here with respect to the Lawson RSS</p> <p>22 application; is that right?</p> <p>23 MS. WILLIAMS: I'm not sure if there was -- if</p> <p>24 there's RSS screen prints in here. My team doesn't</p> <p>25 use RSS as much as the end requisitioners would.</p>	<p>99</p> <p>1 system?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: And then there's an entry for a</p> <p>4 design studio. Do you see that?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Do you know what the design</p> <p>7 studio is?</p> <p>8 MR. YUHASZ: Yes. My knowledge of that is it's</p> <p>9 an application for the Lawson application technical</p> <p>10 team under information technology to be able to</p> <p>11 change the look, feel, and processing of an online</p> <p>12 form -- Lawson online form.</p> <p>13 MR. ROBERTSON: Do you know if the design</p> <p>14 studio was utilized with respect to the requisition</p> <p>15 self-service application to do --</p> <p>16 MR. YUHASZ: My -- my knowledge is that design</p> <p>17 studio is not -- does not -- cannot be used with</p> <p>18 RSS.</p> <p>19 MR. ROBERTSON: Okay. You didn't change the</p> <p>20 look and feel of RSS as part of the implementation?</p> <p>21 MR. YUHASZ: No, my understanding has always</p> <p>22 been you can't.</p> <p>23 MR. ROBERTSON: Okay. Thanks.</p> <p>24 (EXHIBIT NUMBER N14 WAS MARKED FOR IDENTIFICATION.)</p> <p>25 MR. ROBERTSON: Let me show you what's been</p>
<p>98</p> <p>1 Buyers don't create requisition.</p> <p>2 MR. ROBERTSON: Okay. All right. That's all I</p> <p>3 have on that document. Thanks.</p> <p>4 (EXHIBIT NUMBER N13 WAS MARKED FOR IDENTIFICATION.)</p> <p>5 MR. ROBERTSON: Let me show you what I've</p> <p>6 marked as Novant Exhibit Number 13 and ask you to</p> <p>7 take a look at that, if you will. It's a two-page</p> <p>8 document, bears the Bates Label L0156732 [dash] 33.</p> <p>9 Have you seen that before, sir?</p> <p>10 MR. YUHASZ: No.</p> <p>11 MR. ROBERTSON: It's entitled, "Addendum to</p> <p>12 Lawson product software license agreement," and it's</p> <p>13 with the client named Novant Health. Do you see</p> <p>14 that?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: And it's dated sometime in</p> <p>17 March of 2004. Do you see that?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Is that about the time that</p> <p>20 Novant was implementing the RSS solution?</p> <p>21 MR. YUHASZ: It was probably when we were</p> <p>22 considering, right.</p> <p>23 MR. ROBERTSON: All right -- under -- the</p> <p>24 products under agreement, section 1.0, you see</p> <p>25 there's a column that says business management</p>	<p>100</p> <p>1 marked as Novant Exhibit 14 and ask you to take a</p> <p>2 look at that, sir. And while you do, let me just</p> <p>3 for the record say it's a document -- two-page --</p> <p>4 two pages entitled, "Lawson Software, Inc., services</p> <p>5 order form." It's dated in the June of 2006 time</p> <p>6 frame.</p> <p>7 The question -- first question is, have</p> <p>8 you seen this document before?</p> <p>9 MR. YUHASZ: No.</p> <p>10 MR. ROBERTSON: Okay. It's -- it's an order</p> <p>11 form that is with Novant Health. Do you see that</p> <p>12 under client information?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Okay. The services that are</p> <p>15 desired are technical consulting for installation</p> <p>16 and migration on the test server. Do you see that?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: Do you know if this was in</p> <p>19 connection with the RSS application?</p> <p>20 MR. YUHASZ: By the information -- if you look</p> <p>21 under the work order request, the information under</p> <p>22 the client information and the work order request</p> <p>23 row --</p> <p>24 MR. ROBERTSON: Where were you looking at, sir?</p> <p>25 MR. YUHASZ: Work order request.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>101</p> <p>1 MR. ROBERTSON: Okay. Yeah.</p> <p>2 MR. YUHASZ: And it says LSF9.</p> <p>3 MR. ROBERTSON: Yes.</p> <p>4 MR. YUHASZ: That would indicate that is for</p> <p>5 the environment portion of Lawson that supports</p> <p>6 every application under -- running on the Lawson</p> <p>7 server --</p> <p>8 MR. ROBERTSON: Okay.</p> <p>9 MR. YUHASZ: -- and so that was -- this was a</p> <p>10 technical installation of the environment services</p> <p>11 or main infrastructure of the Lawson application.</p> <p>12 MR. ROBERTSON: Which would support the RSS?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Okay. Thanks. That's all I</p> <p>15 have on that question -- on that document. Excuse</p> <p>16 me. Let me just ask some general questions about</p> <p>17 requisition self-service right now, and -- and if</p> <p>18 necessary, let's include the purchase order module</p> <p>19 that, you know, is part of the procurement process</p> <p>20 and perhaps inventory control if -- if it calls for</p> <p>21 it.</p> <p>22 MR. YUHASZ: Okay.</p> <p>23 MR. ROBERTSON: Okay. With that in mind, I</p> <p>24 think you indicated earlier that there were</p> <p>25 approximately 10,000 different vendors that provide</p>	<p>103</p> <p>1 mind, and that was a stent, I believe, was one that</p> <p>2 you may be able to source from multiple vendors; is</p> <p>3 that right?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Okay. I understood you to say</p> <p>6 that the items were medical or surgical supplies; is</p> <p>7 that right?</p> <p>8 MR. YUHASZ: Primarily.</p> <p>9 MR. ROBERTSON: Okay. What other --</p> <p>10 MR. YUHASZ: The majority --</p> <p>11 MR. ROBERTSON: I'm sorry.</p> <p>12 MR. YUHASZ: The majority.</p> <p>13 (DISCUSSION OFF THE RECORD)</p> <p>14 MR. ROBERTSON: What other types of products</p> <p>15 other than medical or surgical supplies are</p> <p>16 available to a purchaser using the RSS system at</p> <p>17 Novant?</p> <p>18 MR. YUHASZ: The next category would be EVS or</p> <p>19 environmental services, and that would include your</p> <p>20 cleaners, your paper towels, toilet paper.</p> <p>21 MR. ROBERTSON: All right. Any -- after that,</p> <p>22 what's maybe the next category of items that might</p> <p>23 be available to a user of the RSS system at Novant?</p> <p>24 MR. YUHASZ: The others would be what we</p> <p>25 consider physician preference items such as implants</p>
<p>102</p> <p>1 items that are available for purchase through the</p> <p>2 RSS system; is that right?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Okay. Do you know</p> <p>5 approximately how many total items of those 10,000</p> <p>6 vendors are perhaps available?</p> <p>7 MR. YUHASZ: That we have established in -- as</p> <p>8 an active status in our item master that's available</p> <p>9 for ordering?</p> <p>10 MR. ROBERTSON: Yes?</p> <p>11 MR. YUHASZ: That's what that would indicate.</p> <p>12 I would say it's between 70 and 80,000.</p> <p>13 MR. ROBERTSON: Okay. And maybe informally off</p> <p>14 the record we discussed this, but there -- will</p> <p>15 there be duplicate items that will be available from</p> <p>16 multiple vendors of those 50,000 items or so --</p> <p>17 excuse -- 70 to 80,000?</p> <p>18 MR. YUHASZ: I would have to say just because</p> <p>19 of the large number of items that there's -- there</p> <p>20 are probably duplicates --</p> <p>21 MR. ROBERTSON: I think --</p> <p>22 MR. YUHASZ: -- to separate -- to different</p> <p>23 vendors.</p> <p>24 MR. ROBERTSON: I'm sorry. I think before we</p> <p>25 started the deposition, we had one such example in</p>	<p>104</p> <p>1 for procedure.</p> <p>2 MR. ROBERTSON: How about pharmaceuticals? Are</p> <p>3 they available?</p> <p>4 MR. YUHASZ: No. I mean, not in the -- very</p> <p>5 few, very small, not controlled substances that --</p> <p>6 MR. ROBERTSON: We briefly touched on some of</p> <p>7 the data that's available when someone is making a</p> <p>8 purchase of a particular item using RSS. Do you</p> <p>9 recall that?</p> <p>10 MR. YUHASZ: Say that again.</p> <p>11 MR. ROBERTSON: The -- the information that's</p> <p>12 available with respect to a particular item --</p> <p>13 MR. YUHASZ: Oh, yes.</p> <p>14 MR. ROBERTSON: Okay. Where we talked about</p> <p>15 pricing information, right?</p> <p>16 MR. YUHASZ: Correct.</p> <p>17 MR. ROBERTSON: And -- and product descriptions</p> <p>18 are available, correct?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: And the identification perhaps</p> <p>21 of the manufacturer?</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: And who the actual supplier is</p> <p>24 would be available?</p> <p>25 MR. YUHASZ: Yes.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>105</p> <p>1 MR. ROBERTSON: And in certain instances there</p> <p>2 are actual pictures that are available of the item?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Is -- all of the items don't</p> <p>5 have pictures; is that right?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: Do the majority of items have</p> <p>8 pictures?</p> <p>9 MR. YUHASZ: No.</p> <p>10 MR. ROBERTSON: What percentage would you</p> <p>11 characterize of the items that have pictures?</p> <p>12 MR. YUHASZ: Very few. The only ones that have</p> <p>13 pictures are ones taken internally of our inventory</p> <p>14 items.</p> <p>15 MR. ROBERTSON: Do any of the vendors supply</p> <p>16 you with pictures of -- of items?</p> <p>17 MR. YUHASZ: No.</p> <p>18 MR. ROBERTSON: Can you just give me a few</p> <p>19 examples of some of the vendors that you have among</p> <p>20 those 10,000?</p> <p>21 MR. YUHASZ: Vendors, the -- the largest one</p> <p>22 would be our distributor Owens &amp; Minor.</p> <p>23 MR. ROBERTSON: Okay. And then how about</p> <p>24 manufacturers?</p> <p>25 MR. YUHASZ: Direct manufacturers, I would say</p>	<p>107</p> <p>1 access the Lawson RSS application?</p> <p>2 MR. YUHASZ: Correct, correct.</p> <p>3 MR. ROBERTSON: You want to just go ahead and</p> <p>4 capture that screen for me?</p> <p>5 MR. YUHASZ: Yes. This -- this one right here?</p> <p>6 MR. ROBERTSON: Yeah.</p> <p>7 MR. YUHASZ: Oh, okay.</p> <p>8 MR. ROBERTSON: Why don't you go ahead and</p> <p>9 let's go do the requisition application. Now, is</p> <p>10 this the first screen you see when you open up the</p> <p>11 Lawson RSS application?</p> <p>12 MR. YUHASZ: No, this is the first screen when</p> <p>13 you join the Lawson portal.</p> <p>14 MR. ROBERTSON: Okay.</p> <p>15 MR. YUHASZ: That's the base online</p> <p>16 application.</p> <p>17 MR. ROBERTSON: Okay. And from this screen,</p> <p>18 I'm going to be able to access the RSS application?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: Why don't you go ahead and do</p> <p>21 that.</p> <p>22 MR. YUHASZ: So I choose requisition</p> <p>23 self-service in the left window pane and then scroll</p> <p>24 down to shopping.</p> <p>25 MR. ROBERTSON: Okay. Can you capture that</p>
<p>106</p> <p>1 Johnson &amp; Johnson types.</p> <p>2 MR. ROBERTSON: All right. Why don't we fire</p> <p>3 up this RSS and see if we can move through.</p> <p>4 MR. YUHASZ: Okay. I'm going to go ahead and</p> <p>5 open up a Word document also.</p> <p>6 MR. ROBERTSON: Can we put it on the screen?</p> <p>7 MR. YUHASZ: Oh, did we die? Did it shut off</p> <p>8 automatically?</p> <p>9 MR. STAFFORD: I think at some point it just</p> <p>10 sort of went blank. Am I in your way?</p> <p>11 MR. YUHASZ: I hope the bulb didn't burn out.</p> <p>12 I forgot to turn it on.</p> <p>13 (DISCUSSION OFF THE RECORD)</p> <p>14 VIDEO TECHNICIAN: Going off the record, the</p> <p>15 time is 11:05.,</p> <p>16 (DISCUSSION OFF THE RECORD)</p> <p>17 VIDEO TECHNICIAN: We're back on the record.</p> <p>18 The time is 11:07.,</p> <p>19 MR. ROBERTSON: Okay. What do we have here,</p> <p>20 sir, which is this first screen?</p> <p>21 MR. YUHASZ: This is the initial screen that</p> <p>22 Novant developed when they click on the link for the</p> <p>23 Lawson application.</p> <p>24 MR. ROBERTSON: Says here, when you click here</p> <p>25 for Lawson portal 9.0.1 test and development, you'll</p>	<p>108</p> <p>1 before we move forward?</p> <p>2 MR. YUHASZ: (Complies.)</p> <p>3 MR. ROBERTSON: All right. Why don't you go</p> <p>4 ahead and go into shopping. Okay. Why don't you</p> <p>5 capture that screen while we're in it. All right.</p> <p>6 At the top, there is a link for find [slash] shop.</p> <p>7 Do you see that?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. ROBERTSON: That's a drop-down menu, right?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: Can you drop it down for me?</p> <p>12 All right. Can you capture that, please?</p> <p>13 MR. YUHASZ: Let's see if it captures that.</p> <p>14 Yes, it does.</p> <p>15 MR. ROBERTSON: Great. I want to go back to</p> <p>16 it. All right. When you drop -- do the drop-down</p> <p>17 menu, there's four items available on the menu,</p> <p>18 correct?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: And one is search catalog,</p> <p>21 right?</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: Why don't you click on search</p> <p>24 catalog for me.</p> <p>25 MR. YUHASZ: Oh, you must enter your profile</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>109</p> <p>1 information prior to moving forward, so it has your</p> <p>2 location information, so I've got to put in a</p> <p>3 default "from" location.</p> <p>4 MR. ROBERTSON: Says search for inventory or</p> <p>5 non-stock item. What's a non-stock item?</p> <p>6 MR. YUHASZ: It means it is not from our</p> <p>7 internal distribution center. It is going to be</p> <p>8 shipped directly from a supplier.</p> <p>9 MR. ROBERTSON: Okay. Can you enter an item, a</p> <p>10 non-stock item in there so we can see the result we</p> <p>11 get from the supplier?</p> <p>12 MR. YUHASZ: And do you want that search by a</p> <p>13 description portion or items or --</p> <p>14 MR. ROBERTSON: Why don't we -- why don't we do</p> <p>15 description first.</p> <p>16 MR. YUHASZ: Okay.</p> <p>17 MR. ROBERTSON: Okay. Can you capture that</p> <p>18 screen for me?</p> <p>19 MR. YUHASZ: (Complies.)</p> <p>20 MR. ROBERTSON: Okay. So there we have as a</p> <p>21 result a hit list, if you will, of the -- the items</p> <p>22 that matched that query; is that right?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. ROBERTSON: And I see there are manufacture</p> <p>25 codes. Does that reflect there are different</p>	<p>111</p> <p>1 appears on the screen --</p> <p>2 MR. YUHASZ: Right, if you see the next here --</p> <p>3 MR. ROBERTSON: Oh, I see.</p> <p>4 MR. YUHASZ: -- you know to go to -- there's</p> <p>5 more pages.</p> <p>6 MR. ROBERTSON: So I would imagine there's</p> <p>7 probably multiple pages of suppliers of stents that</p> <p>8 we would see if we hit the next page?</p> <p>9 MR. YUHASZ: Correct.</p> <p>10 MR. ROBERTSON: Okay.</p> <p>11 MR. YUHASZ: And -- correct.</p> <p>12 MR. ROBERTSON: It looks like for each of these</p> <p>13 manufacturers there's a -- a code number. That</p> <p>14 appears to be a link. Do you see that? Let me just</p> <p>15 give you an example. The first one I see there is</p> <p>16 102021; is that right?</p> <p>17 MR. YUHASZ: Correct.</p> <p>18 MR. ROBERTSON: Okay. What happens if I click</p> <p>19 on that?</p> <p>20 MR. YUHASZ: That brings up more detailed item</p> <p>21 information, item master information.</p> <p>22 MR. ROBERTSON: Why don't you go ahead and</p> <p>23 click on that.</p> <p>24 MR. YUHASZ: (Complies.)</p> <p>25 MR. ROBERTSON: Okay. So it's identifying for</p>
<p>110</p> <p>1 manufacturers of these various stents?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Okay. So -- and is this a</p> <p>4 manufacturer name, ABBT and Gore and BOST?</p> <p>5 MR. YUHASZ: It is the internal Novant code for</p> <p>6 a manufacturer.</p> <p>7 MR. ROBERTSON: Okay. Are they different</p> <p>8 manufacturers?</p> <p>9 MR. YUHASZ: Which ones?</p> <p>10 MR. ROBERTSON: Is ABBT, that internal Novant</p> <p>11 code, a different manufacturer than, for example,</p> <p>12 BOST?</p> <p>13 MR. YUHASZ: Correct.</p> <p>14 MR. ROBERTSON: Okay. What does ABBT stand</p> <p>15 for, if you know?</p> <p>16 MR. YUHASZ: Abbott.</p> <p>17 MR. ROBERTSON: And what does BOST stand for?</p> <p>18 MR. YUHASZ: Boston Scientific --</p> <p>19 MR. ROBERTSON: Boston -- okay. Can you just</p> <p>20 scroll down on the right for me, and I want to see</p> <p>21 if -- okay. Is this the sum total of all of the</p> <p>22 stents that are available for purchase in the Lawson</p> <p>23 item master database, or is there a way to go to</p> <p>24 additional pages? Do you understand my question?</p> <p>25 I'm just wondering, is this the sum total that</p>	<p>112</p> <p>1 me an ID number. Is that -- for the source vendor,</p> <p>2 is that the ID of the vendor?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: And then it indicates this is</p> <p>5 from Abbott Vascular as the vendor?</p> <p>6 MR. YUHASZ: Correct.</p> <p>7 MR. ROBERTSON: And it's got the vendor</p> <p>8 location, correct?</p> <p>9 MR. YUHASZ: This doesn't have any information</p> <p>10 in there --</p> <p>11 MR. ROBERTSON: Well, it says --</p> <p>12 MR. YUHASZ: -- except the city --</p> <p>13 MR. ROBERTSON: Santa Clara, California,</p> <p>14 correct?</p> <p>15 MR. YUHASZ: Yeah.</p> <p>16 MR. ROBERTSON: There's a manufacturer number</p> <p>17 on this page. Do you see that?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Is that the part number, or is</p> <p>20 that the code number for the manufacturer?</p> <p>21 MR. YUHASZ: That's the part number of that</p> <p>22 item from Abbott Vascular.</p> <p>23 MR. ROBERTSON: And I'm not going to read it</p> <p>24 out loud, but there's pricing information with</p> <p>25 respect to this item, correct?</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p style="text-align: right;">113</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. STAFFORD: Excuse me, sir, just for the</p> <p>3 record that's listed under cost.</p> <p>4 MR. ROBERTSON: Thanks.</p> <p>5 MR. ROBERTSON: And that's in United States</p> <p>6 dollars, right?</p> <p>7 MR. YUHASZ: Correct.</p> <p>8 MR. ROBERTSON: What is -- what is -- is it UDM</p> <p>9 I see there or UOM?</p> <p>10 MR. YUHASZ: U--- UOM.</p> <p>11 MR. ROBERTSON: Now, is that the unit cost</p> <p>12 or --</p> <p>13 MR. YUHASZ: Unit of measure.</p> <p>14 MR. ROBERTSON: Okay.</p> <p>15 MR. YUHASZ: So that's -- that's what the cost</p> <p>16 is being expressed in.</p> <p>17 MR. ROBERTSON: Why don't you capture that</p> <p>18 screen for me, because --</p> <p>19 MR. YUHASZ: (Complies.)</p> <p>20 MR. ROBERTSON: Now, I see next to the</p> <p>21 description of the stent there is some numbers.</p> <p>22 There is .035, and it looks like 8 times 90 times</p> <p>23 120; is that right?</p> <p>24 MR. YUHASZ: Correct.</p> <p>25 MR. ROBERTSON: Okay. That's a</p>	<p style="text-align: right;">115</p> <p>1 MR. ROBERTSON: All right. Why don't we go</p> <p>2 back and pick another -- do you know what's going</p> <p>3 on?</p> <p>4 MR. STAFFORD: Off the record.</p> <p>5 (DISCUSSION OFF THE RECORD)</p> <p>6 MR. YUHASZ: Okay. We'll do it -- we'll do the</p> <p>7 check, and we'll do "add selected" as another way</p> <p>8 you can add multiple items. Add selected --</p> <p>9 MR. ROBERTSON: Still getting thermometers?</p> <p>10 MR. YUHASZ: Yeah, don't want that. Let me</p> <p>11 just clear my shopping cart, and let's just make</p> <p>12 sure it's doing new. I have no idea. That might be</p> <p>13 better to go by.</p> <p>14 MR. ROBERTSON: Syringe, I don't know.</p> <p>15 MR. STAFFORD: Thermometer. See what it comes</p> <p>16 up with this time.</p> <p>17 MR. YUHASZ: I don't -- so I don't know what is</p> <p>18 happening here. This is where I shared with</p> <p>19 Mark earlier, because you wanted to go all the way</p> <p>20 through a purchase order, I'm in the test system, so</p> <p>21 I don't know if because of the problems we've had IT</p> <p>22 has loaded patches and things that aren't fully</p> <p>23 tested into the test system. Because I can</p> <p>24 guarantee you this doesn't occur in the production</p> <p>25 system, but if I move to the production system, I</p>
<p style="text-align: right;">114</p> <p>1 characterization of the -- the -- what the size of</p> <p>2 the stent that's involved?</p> <p>3 MR. YUHASZ: Right.</p> <p>4 MR. ROBERTSON: Why don't you go ahead and add</p> <p>5 that to our shopping cart. Could you -- could</p> <p>6 you -- let me ask you a question, first. When you</p> <p>7 added that to our shopping cart, shopping cart</p> <p>8 reflects that there's a probe thermometer digital.</p> <p>9 How did that happen?</p> <p>10 MR. YUHASZ: I have no idea.</p> <p>11 MR. ROBERTSON: All right. Well, let's go back</p> <p>12 and get some -- I want to add a stent if I can. So</p> <p>13 can we go back -- for the record, that should not</p> <p>14 have occurred; is that right?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. ROBERTSON: Let's go back and pick another</p> <p>17 stent.</p> <p>18 MR. YUHASZ: Go back to my -- that's very</p> <p>19 interesting. See if it adds it correctly when --</p> <p>20 which one did we have?</p> <p>21 MR. ROBERTSON: I think it was on the next page</p> <p>22 actually, but -- well, let's try another one. And</p> <p>23 it's the same number all the time.</p> <p>24 MR. YUHASZ: Same item. I don't know what's</p> <p>25 happening there.</p>	<p style="text-align: right;">116</p> <p>1 can save the requisition, but I won't be able to --</p> <p>2 unless we find a requisition that's valid that we</p> <p>3 can find from a user who really wants to order and</p> <p>4 we take it over and order it, I can put that in</p> <p>5 there, you know, but I can't order a good for</p> <p>6 myself.</p> <p>7 MR. STAFFORD: Mr. Robertson, just to make</p> <p>8 sure, I was informed earlier today that what you're</p> <p>9 saying is the exact system fully populated, we</p> <p>10 thought fully working as of December '09 so that you</p> <p>11 could walk all the way through because -- unless</p> <p>12 it's a real order. On the noncopy, you can't go all</p> <p>13 the way to the last step. Can you go into that</p> <p>14 other system while we're here today and show him you</p> <p>15 just can't go all the way through?</p> <p>16 MR. YUHASZ: It just won't be able to create</p> <p>17 the purchase order.</p> <p>18 MR. ROBERTSON: All right. Well, let's --</p> <p>19 MR. YUHASZ: Because I --</p> <p>20 MR. ROBERTSON: Can you just click on another</p> <p>21 ad in the cart and see if we have a problem there,</p> <p>22 if we're getting --</p> <p>23 MR. YUHASZ: And let's see.</p> <p>24 MR. ROBERTSON: And one of those I think did</p> <p>25 say cost zero. Maybe that's not available. I don't</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>117</p> <p>1 know if that's one you hit. Just add anything.</p> <p>2 MR. YUHASZ: I don't know what's going on with</p> <p>3 those now. Yeah, I know the quality of the software</p> <p>4 wasn't -- wasn't the best, but it's not -- we</p> <p>5 wouldn't have gone to production.</p> <p>6 MR. ROBERTSON: Well, here's -- here's what I'm</p> <p>7 going to need to do.</p> <p>8 MR. ROBERTSON: Let's just go off the record</p> <p>9 for a moment.</p> <p>10 VIDEO TECHNICIAN: Going off the record. The</p> <p>11 time is 11:20.,</p> <p>12 (DISCUSSION OFF THE RECORD)</p> <p>13 VIDEO TECHNICIAN: We're back on the record.</p> <p>14 Time is 11:22.,</p> <p>15 MR. YUHASZ: Can I show you an inventory item</p> <p>16 order?</p> <p>17 MR. ROBERTSON: Actually, I want to do it</p> <p>18 from -- not internal inventory. I want to do it</p> <p>19 from suppliers.</p> <p>20 MR. YUHASZ: Okay. Want to do -- okay.</p> <p>21 MR. ROBERTSON: Why don't you try stent there?</p> <p>22 MR. YUHASZ: (Complies.)</p> <p>23 MR. ROBERTSON: How do I know I'm getting a</p> <p>24 non-stock item and not inventory?</p> <p>25 MR. YUHASZ: The --</p>	<p>119</p> <p>1 35050-0822. Do you see that?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Okay. What is that number? Is</p> <p>4 that the individual part number?</p> <p>5 MR. YUHASZ: That's the manufacturer part</p> <p>6 number for that stent, correct, from Boston</p> <p>7 Scientific.</p> <p>8 MR. ROBERTSON: Okay. If I wanted to find a</p> <p>9 stent from another manufacturer that had the same</p> <p>10 characteristics of the one that we selected, how</p> <p>11 could I go about doing that?</p> <p>12 MR. YUHASZ: This is where he's saying the way</p> <p>13 she knows to do is by the PF72 vendor. You'd have</p> <p>14 to know the -- the part numbers for better</p> <p>15 equivalence.</p> <p>16 MR. ROBERTSON: Could I actually scroll down</p> <p>17 the description and look to see if there was a</p> <p>18 similar description of the stent from a different</p> <p>19 manufacturer?</p> <p>20 MR. YUHASZ: Yes.</p> <p>21 MR. ROBERTSON: Okay. All right. I want to</p> <p>22 keep going until we find something that's not Boston</p> <p>23 Scientific. Okay. So we're looking for one</p> <p>24 that's -- what is it -- 2.25. Could you -- go to</p> <p>25 the cart and click on the -- the number there so we</p>
<p>118</p> <p>1 MR. ROBERTSON: The check?</p> <p>2 MR. YUHASZ: The check.</p> <p>3 MR. ROBERTSON: Okay. So check is a non-stock</p> <p>4 item, correct?</p> <p>5 MR. YUHASZ: Correct.</p> <p>6 MR. ROBERTSON: Okay. Why don't you go ahead</p> <p>7 and capture that screen.</p> <p>8 MR. YUHASZ: I'm just going to go ahead and</p> <p>9 save this to file to my desk so I don't lose it.</p> <p>10 Okay.</p> <p>11 MR. ROBERTSON: All right. Let's see if we can</p> <p>12 add one of those non-stock items to our cart.</p> <p>13 MR. YUHASZ: Let me try doing the Boston.</p> <p>14 Okay.</p> <p>15 MR. ROBERTSON: Now, let's capture that screen</p> <p>16 if you could.</p> <p>17 MR. YUHASZ: Okay.</p> <p>18 MR. ROBERTSON: All right. Now, the cart is</p> <p>19 the requisition form that you're building, correct?</p> <p>20 MR. YUHASZ: Correct.</p> <p>21 MR. ROBERTSON: Okay. There's a -- just by way</p> <p>22 of example, there's the one that -- the one that we</p> <p>23 picked to include has a number after the</p> <p>24 manufacturer internal code. For example, I'm</p> <p>25 looking at the one I think we selected which is</p>	<p>120</p> <p>1 just get the particular size that we're looking for.</p> <p>2 It's 2.25 by 8. Let me see if we can find another</p> <p>3 vendor with a stent that's 2.25 by 8.</p> <p>4 MR. YUHASZ: Okay. Go back to -- now, this --</p> <p>5 if you want me to aid this process, this is where</p> <p>6 our Novant developed search, probably where our</p> <p>7 users would go.</p> <p>8 MR. ROBERTSON: What is -- what is that? Is it</p> <p>9 using the Lawson RSS?</p> <p>10 MR. YUHASZ: No.</p> <p>11 MR. ROBERTSON: Why can't we go back here?</p> <p>12 MR. YUHASZ: It's loading. I don't know. I'm</p> <p>13 just going back to the search catalog function, and</p> <p>14 this is in production.</p> <p>15 MR. ROBERTSON: Can we start over?</p> <p>16 MR. YUHASZ: There we go.</p> <p>17 MR. ROBERTSON: All right. We're looking for</p> <p>18 2.25 by 8. Need to get past Boston Scientific.</p> <p>19 We're starting -- there's a code for JJ. You see</p> <p>20 that?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. ROBERTSON: Is that Johnson &amp; Johnson?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. ROBERTSON: There's a 2 -- there's one, a 2</p> <p>25 by -- 2.5 by 8. Do you see that one?</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p style="text-align: right;">121</p> <p>1 MR. YUHASZ: Correct.</p> <p>2 MR. ROBERTSON: Can you add that one?</p> <p>3 MR. YUHASZ: (Complies.)</p> <p>4 MR. ROBERTSON: Okay. So capture that screen.</p> <p>5 Sorry.</p> <p>6 MR. YUHASZ: Okay. Yes. Oh, okay.</p> <p>7 MR. ROBERTSON: All right. That -- is that an</p> <p>8 example of a product that's available from two</p> <p>9 separate vendors?</p> <p>10 MR. YUHASZ: I wouldn't be able to say that</p> <p>11 just by the description, no.</p> <p>12 MR. ROBERTSON: Well, it seems to have the same</p> <p>13 dimensions; isn't that right?</p> <p>14 MR. YUHASZ: Right, but that's -- that's very</p> <p>15 minimal of what that stent could be used for and how</p> <p>16 it's to be done in a procedure.</p> <p>17 MR. ROBERTSON: How can I get a more robust</p> <p>18 description of this stent than a particular -- you</p> <p>19 had an opportunity to get -- click on the actual</p> <p>20 product description; is that right?</p> <p>21 MR. YUHASZ: Yeah. In Lawson, there is none.</p> <p>22 A 30 character description is mainly what displays.</p> <p>23 MR. ROBERTSON: Okay. Can you click on the</p> <p>24 other -- can you print -- capture that screen for</p> <p>25 me, please? For --</p>	<p style="text-align: right;">123</p> <p>1 MR. YUHASZ: Okay.</p> <p>2 MR. ROBERTSON: The test system was at least</p> <p>3 faster.</p> <p>4 MR. YUHASZ: I don't know what's going on.</p> <p>5 MR. STAFFORD: Perhaps lots of things being</p> <p>6 purchased today.</p> <p>7 MR. YUHASZ: I mean, if -- yeah.</p> <p>8 MR. ROBERTSON: Why don't you go to the</p> <p>9 drop-down menu, see if you can do search catalog</p> <p>10 again. Maybe it will come up. Why don't we look</p> <p>11 for -- don't put stent in. Why don't we look for</p> <p>12 something that might be more of a commodity. You</p> <p>13 said there were those environmental services type of</p> <p>14 products. I don't know, one come to mind? I</p> <p>15 don't -- paper towels, can we do that?</p> <p>16 MR. YUHASZ: If you still want to look for</p> <p>17 something that's purchased direct from supplier?</p> <p>18 MR. ROBERTSON: I do. And that's a -- it maybe</p> <p>19 is more of a commodity than a stent.</p> <p>20 MR. YUHASZ: I didn't hear you. A mop.</p> <p>21 MR. ROBERTSON: You put a period after it, I</p> <p>22 think. You meant to do that?</p> <p>23 MR. YUHASZ: A comma.</p> <p>24 MR. ROBERTSON: Okay. Oh, okay. So, again, we</p> <p>25 have multiple vendors there; is that right?</p>
<p style="text-align: right;">122</p> <p>1 MR. YUHASZ: Exactly as this is?</p> <p>2 MR. ROBERTSON: Yes. All right. Can you click</p> <p>3 on the other description of the other product and</p> <p>4 capture that screen for me? All right. If I wanted</p> <p>5 to delete something from my cart, I see there's a</p> <p>6 little trash can icon on the cart. If I hit that,</p> <p>7 would it delete the item?</p> <p>8 MR. YUHASZ: Correct.</p> <p>9 MR. ROBERTSON: Okay. Don't go ahead and do</p> <p>10 that yet. If -- if I wanted to then approve that</p> <p>11 cart, satisfied with purchasing those two stents, I</p> <p>12 would -- would I go down to the checkout?</p> <p>13 MR. YUHASZ: Correct.</p> <p>14 MR. ROBERTSON: And would that start to take me</p> <p>15 into the requisition -- excuse me -- the purchase</p> <p>16 order process?</p> <p>17 MR. YUHASZ: It would put this requisition in a</p> <p>18 status for supply chain sourcing to -- to make that</p> <p>19 become a PO.</p> <p>20 MR. ROBERTSON: Can we go back to our -- have</p> <p>21 the ability to go back to our list for hits for</p> <p>22 stent? You have to start all over again?</p> <p>23 MR. YUHASZ: Yes.</p> <p>24 MR. ROBERTSON: Why don't you go to the</p> <p>25 shopping list functionality.</p>	<p style="text-align: right;">124</p> <p>1 MR. YUHASZ: Yes.</p> <p>2 MR. ROBERTSON: Okay. And various mops. Is</p> <p>3 that -- there's some costing information there in</p> <p>4 the tens of thousands of dollars. That can't be for</p> <p>5 a -- a single mop. How -- what is -- what is that?</p> <p>6 MR. STAFFORD: It's a really nice one.</p> <p>7 MR. ROBERTSON: It's a really nice mop. All</p> <p>8 right. Is RUBB the vendor -- the manufacturer code</p> <p>9 for, what, Rubbermaid?</p> <p>10 MR. YUHASZ: Probably, yes.</p> <p>11 MR. ROBERTSON: All right. Trying to see if</p> <p>12 there's any other similar -- could you -- there's no</p> <p>13 next page, so this is all the mops that are</p> <p>14 available, right?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. ROBERTSON: Actually, just capture that</p> <p>17 screen shot for me.</p> <p>18 MR. YUHASZ: (Complies.)</p> <p>19 MR. ROBERTSON: Okay. Let's pick a mop to add</p> <p>20 to our requisition. How about the one by SAF, like</p> <p>21 fourth, fifth -- fifth one up from the bottom or</p> <p>22 something. No, not that one because it's got a</p> <p>23 ridiculous price. I think like the fourth one up</p> <p>24 from the bottom, if I'm not correct, that looks like</p> <p>25 a reasonable cost of a mop.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>125</p> <p>1 MR. STAFFORD: Mr. Robertson, I think what</p> <p>2 you're seeing as tens of thousands actually has a</p> <p>3 dot after the second -- it's \$17.35 --</p> <p>4 MR. YUHASZ: It's \$17 -- it's \$17---</p> <p>5 MR. ROBERTSON: Oh, okay. All right.</p> <p>6 MR. STAFFORD: I'm only seeing that because my</p> <p>7 bifocals are closer than yours.</p> <p>8 MR. ROBERTSON: My bifocals are not working.</p> <p>9 MR. ROBERTSON: Okay. Why don't we capture</p> <p>10 that screen shot.</p> <p>11 MR. YUHASZ: (Complies.)</p> <p>12 MR. ROBERTSON: All right. Now, I want to shop</p> <p>13 a different way other than using this search catalog</p> <p>14 capability.</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: What -- let me just ask you</p> <p>17 generally, there's one more shopping list. Can you</p> <p>18 just describe for me what functionality -- before</p> <p>19 you click on it -- that I'm going to find with the</p> <p>20 shopping list? What's that capability provide?</p> <p>21 MR. YUHASZ: The shopping list capability</p> <p>22 provides where Novant has built a shopping list</p> <p>23 catered for particular reasons. For example, a</p> <p>24 certain requesting location such as a cath lab at</p> <p>25 Forsyth Medical Center may have their own shopping</p>	<p>127</p> <p>1 seeing 28---</p> <p>2 MR. YUHASZ: On the --</p> <p>3 MR. ROBERTSON: I see.</p> <p>4 MR. YUHASZ: I'm sorry.</p> <p>5 MR. ROBERTSON: That's a -- Lawson created --</p> <p>6 MR. YUHASZ: That's a Lawson -- Novant sourcing</p> <p>7 makes that item and makes that mop have that item</p> <p>8 number in the Lawson item master.</p> <p>9 MR. ROBERTSON: But the manufacturer item</p> <p>10 number is also there for that particular mop,</p> <p>11 correct?</p> <p>12 MR. YUHASZ: Correct, here in the search.</p> <p>13 MR. ROBERTSON: Right.</p> <p>14 MR. YUHASZ: Right.</p> <p>15 MR. ROBERTSON: Okay. Can you be back to the</p> <p>16 drop-down menu again? And there was the categories</p> <p>17 available on a menu. What is that used for?</p> <p>18 MR. YUHASZ: That would be where the -- the</p> <p>19 un-spec, UNSPSC, search --</p> <p>20 MR. ROBERTSON: So I could put the -- I could</p> <p>21 go to categories and put in a UNSPSC code?</p> <p>22 MR. YUHASZ: Correct.</p> <p>23 MR. ROBERTSON: Why don't we try that.</p> <p>24 MR. YUHASZ: (Complies.)</p> <p>25 MR. ROBERTSON: All right. There is a</p>
<p>126</p> <p>1 center -- shopping list for the items they regularly</p> <p>2 order, and it just brings up those items rather than</p> <p>3 having to search the whole catalog and go through</p> <p>4 that process. It's a succinct list of items. The</p> <p>5 other are company shopping lists which is referred</p> <p>6 to in previous documentations where you saw the NLC</p> <p>7 shopping lists. So that's all the inventory items</p> <p>8 in our distribution center that they can quickly</p> <p>9 search and find and obtain.</p> <p>10 MR. ROBERTSON: Okay. How about on the express</p> <p>11 order drop-down menu? What does that provide?</p> <p>12 MR. YUHASZ: Express order is when the customer</p> <p>13 feels they know they have the Lawson item number</p> <p>14 correct and it's usually quicker to order and they</p> <p>15 can just enter in the item number and the quantity</p> <p>16 and move on.</p> <p>17 MR. ROBERTSON: When you say the item number,</p> <p>18 you mean, for example, the part number of that</p> <p>19 particular --</p> <p>20 MR. YUHASZ: The Lawson item number that the</p> <p>21 source has established in the item master for that</p> <p>22 item. So for the items in this shopping cart, that</p> <p>23 mop, example, they would have to know 28238 to order</p> <p>24 it through express order.</p> <p>25 MR. ROBERTSON: I'm sorry. Where are you</p>	<p>128</p> <p>1 taxonomy, is that right, for the various categories</p> <p>2 available on -- in the UNSPSC; is that right?</p> <p>3 MR. YUHASZ: Correct.</p> <p>4 MR. ROBERTSON: And that permits you to click</p> <p>5 on that link for a desired category, and then drill</p> <p>6 down, if you will, to come to a particular type of</p> <p>7 item available for sale; is that right?</p> <p>8 MR. YUHASZ: The items we have established in</p> <p>9 the item master with that particular taxonomy would</p> <p>10 appear for ordering.</p> <p>11 MR. ROBERTSON: Okay. Can we capture this</p> <p>12 screen first? Thanks.</p> <p>13 MR. YUHASZ: (Complies.)</p> <p>14 MR. ROBERTSON: All right. What I'd like to do</p> <p>15 is for a category that is going to be available with</p> <p>16 items that are in the -- the database and see if we</p> <p>17 can't drill down and --</p> <p>18 MR. YUHASZ: I think we have chemical items --</p> <p>19 MR. ROBERTSON: Can we do paper? Can we do</p> <p>20 something like --</p> <p>21 MR. YUHASZ: There we go. Let's go to paper.</p> <p>22 MR. ROBERTSON: Okay. Actually I needed you to</p> <p>23 capture that screen, capture that screen that you're</p> <p>24 drilling down.</p> <p>25 MR. YUHASZ: Oh, I'm sorry.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>129</p> <p>1 MR. ROBERTSON: That's all right. Just go from</p> <p>2 there.</p> <p>3 MR. YUHASZ: Okay.</p> <p>4 MR. ROBERTSON: Before you go any further,</p> <p>5 could you just scroll down on the right there so I</p> <p>6 can see what other --</p> <p>7 MR. YUHASZ: Okay.</p> <p>8 MR. ROBERTSON: Why don't we try personal paper</p> <p>9 products. There's paper towels. Want to try those?</p> <p>10 And so why don't you capture that screen for me</p> <p>11 while you're at it. So by using this UNSPSC</p> <p>12 classification system, we're able to drill down on</p> <p>13 the taxonomy and come up with a hit list that has</p> <p>14 paper towels that are manufactured by various</p> <p>15 vendors, correct?</p> <p>16 MR. YUHASZ: Correct.</p> <p>17 MR. ROBERTSON: GP probably stands for</p> <p>18 Georgia-Pacific?</p> <p>19 MR. YUHASZ: Correct.</p> <p>20 MR. ROBERTSON: KC, is that Kimberly-Clark?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. ROBERTSON: Okay. Why don't you -- and</p> <p>23 that -- this is -- there's only one screen, so</p> <p>24 that's all the paper towels that are available; is</p> <p>25 that right?</p>	<p>131</p> <p>1 in this box for paper towels?</p> <p>2 MR. YUHASZ: That's within shopping lists.</p> <p>3 MR. ROBERTSON: Yeah. Could we? Well, let me</p> <p>4 just capture this screen first since -- okay. Why</p> <p>5 don't you enter paper towels and see what we get.</p> <p>6 MR. YUHASZ: So this is my shopping list name,</p> <p>7 so this is not by item description. It's -- you're</p> <p>8 going to put in a name of a shopping list,</p> <p>9 evidently. I mean, just the normal way we -- in the</p> <p>10 document we train our customers is, from this screen</p> <p>11 they're normally going to go to a -- a location</p> <p>12 shopping list which is specific to their ordering</p> <p>13 location or to a company one --</p> <p>14 MR. ROBERTSON: Okay. Could we try -- can we</p> <p>15 try and do that and see if we can find a paper towel</p> <p>16 that's available from some location?</p> <p>17 MR. YUHASZ: I'm probably going to have to go</p> <p>18 to the company one --</p> <p>19 MR. ROBERTSON: Okay.</p> <p>20 MR. YUHASZ: -- because it will have to be in</p> <p>21 inventory.</p> <p>22 MR. ROBERTSON: All right. Why don't we just</p> <p>23 capture that if we can for a moment. So these are</p> <p>24 shopping lists that are for these various companies?</p> <p>25 MR. YUHASZ: These -- these are generally</p>
<p>130</p> <p>1 MR. YUHASZ: Correct. Yeah, I got some to</p> <p>2 scroll down here. There's one more.</p> <p>3 MR. ROBERTSON: Okay. Why don't you pick one</p> <p>4 and let's add it to our -- can you just scroll up</p> <p>5 for a minute?</p> <p>6 MR. YUHASZ: (Complies.)</p> <p>7 MR. ROBERTSON: Okay. I see the -- there are</p> <p>8 checkmarks for the non-stock items and this -- and</p> <p>9 the check plus for the stock items, but I don't see</p> <p>10 any checks next to these items. What does that</p> <p>11 indicate?</p> <p>12 MR. YUHASZ: If you recognize, it's at your</p> <p>13 "from" location, so in my profile when I came in</p> <p>14 here, I'm established like I'm ordering for Forsyth</p> <p>15 Medical Center.</p> <p>16 MR. ROBERTSON: Okay.</p> <p>17 MR. YUHASZ: So these items aren't established</p> <p>18 for ordering by -- by Forsyth Medical Center.</p> <p>19 MR. ROBERTSON: Okay. Can you capture that</p> <p>20 screen for me? I don't think we did that. Let's go</p> <p>21 back to our find/shop drop-down menu, and can you go</p> <p>22 to shopping list?</p> <p>23 MR. YUHASZ: Hey, it came up quicker this time.</p> <p>24 I don't know what happened.</p> <p>25 MR. ROBERTSON: Okay. We can do a query in --</p>	<p>132</p> <p>1 available for any requisitioner at Novant. They're</p> <p>2 company-level shopping lists --</p> <p>3 MR. ROBERTSON: Is the company -- I'm sorry. I</p> <p>4 didn't mean to interrupt you.</p> <p>5 MR. YUHASZ: No, it's all right.</p> <p>6 MR. ROBERTSON: Is the company here Novant?</p> <p>7 MR. YUHASZ: Correct.</p> <p>8 MR. ROBERTSON: So this is all Novant</p> <p>9 inventory?</p> <p>10 MR. YUHASZ: Well -- well, the NLC stocked</p> <p>11 shopping list is all the inventory items, the</p> <p>12 shopping list for all of those items --</p> <p>13 MR. ROBERTSON: Well, what about patient chart</p> <p>14 assembly items? Is that a Novant inventory items?</p> <p>15 MR. YUHASZ: That -- it may be a mix of</p> <p>16 catalog -- I mean -- of non-stock and stock. It's a</p> <p>17 grouping of patient chart assembly items that's</p> <p>18 available for all Novant employees.</p> <p>19 MR. ROBERTSON: Okay. Is there any one of</p> <p>20 these shopping lists that you think might have paper</p> <p>21 towels available --</p> <p>22 MR. YUHASZ: Oh, shopping -- the NLC stock</p> <p>23 shopping list, our inventory list of items.</p> <p>24 MR. ROBERTSON: Okay. Something that's not</p> <p>25 non-inventory, and if not, we'll just take a guess</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>1 or stab.</p> <p>2 MR. YUHASZ: Not -- not in -- not in these</p> <p>3 company shopping lists. The only thing that's going</p> <p>4 to have paper towels is our -- I mean, that's</p> <p>5 probably why -- that's probably why they're not set</p> <p>6 up by the -- they're probably only at the -- as an</p> <p>7 inventory item for us.</p> <p>8 MR. ROBERTSON: How about a stent? Is there</p> <p>9 anything besides the NLC stock shopping list that</p> <p>10 would have a stent?</p> <p>11 MR. YUHASZ: None of these would. The only</p> <p>12 thing that's going to have -- that I know is going</p> <p>13 to have some non-stock items is our NMG catalog.</p> <p>14 That's the one used for the ambulatory care for that</p> <p>15 special --</p> <p>16 MR. ROBERTSON: Let's click on that and see</p> <p>17 what we get.</p> <p>18 MR. YUHASZ: That would have non-stock items in</p> <p>19 it. So here's a non-stock item.</p> <p>20 MR. ROBERTSON: Why don't you go ahead and add</p> <p>21 that.</p> <p>22 MR. YUHASZ: Interesting.</p> <p>23 MR. ROBERTSON: Okay. Can you capture that</p> <p>24 page for me.</p> <p>25 MR. STAFFORD: Just so the record's clear,</p>	<p>133</p> <p>1 didn't, please do. Yeah, thanks for that. All</p> <p>2 right. And just, why don't we add that paper towel,</p> <p>3 kitchen. All right.</p> <p>4 MR. YUHASZ: Capture this one?</p> <p>5 MR. ROBERTSON: Yeah, capture that screen.</p> <p>6 Thanks. So it just -- if I -- if I pick checkout</p> <p>7 now, does that approve the requisition?</p> <p>8 MR. YUHASZ: Again, for items with a Lawson</p> <p>9 item master number ordered through RSS, there is no</p> <p>10 approvals.</p> <p>11 MR. ROBERTSON: So what happens if I hit</p> <p>12 checkout?</p> <p>13 MR. YUHASZ: You hit checkout, the req is --</p> <p>14 becomes available for sourcing to process.</p> <p>15 MR. ROBERTSON: For the purchase order process?</p> <p>16 MR. YUHASZ: Correct, purchase order or</p> <p>17 inventory shipment.</p> <p>18 MR. ROBERTSON: I mean, I don't want to buy</p> <p>19 these things because I know we're using a live</p> <p>20 system --</p> <p>21 MR. YUHASZ: Right.</p> <p>22 MR. ROBERTSON: -- but can we hit checkout and</p> <p>23 go to the next before we purchase, or if you hit</p> <p>24 checkout it's going to --</p> <p>25 MR. YUHASZ: It's going to show up because I'm</p>
<p>134</p> <p>1 you've added an applicator; is that correct?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: Okay. I understand that lunch</p> <p>4 has arrived, so maybe this is a good breaking point.</p> <p>5 Only thing I'd like to do -- I don't want to lose</p> <p>6 this data.</p> <p>7 MR. YUHASZ: Now, I can -- to go maybe to your</p> <p>8 paper towel thing, once I'm in this shopping list, I</p> <p>9 can search here for like towel and see if this</p> <p>10 shopping list within the shopping list and towel.</p> <p>11 MR. ROBERTSON: So we got something?</p> <p>12 MR. YUHASZ: Yes.</p> <p>13 MR. ROBERTSON: All right. Can you go -- can</p> <p>14 you go back -- see where it says back? Type in</p> <p>15 towel. Capture that screen, please, before you</p> <p>16 search --</p> <p>17 MR. YUHASZ: Okay. Okay.</p> <p>18 MR. ROBERTSON: Okay. Now, let's search and --</p> <p>19 just hold on. There's a -- I'm sorry. The one</p> <p>20 that's down there is 147422 paper towel, kitchen,</p> <p>21 which is the same we have in our shopping list.</p> <p>22 Could we add that.</p> <p>23 MR. YUHASZ: Do you want me to capture this</p> <p>24 screen?</p> <p>25 MR. ROBERTSON: I thought we did, but if we</p>	<p>135</p> <p>1 in the production and it's going to show up in a</p> <p>2 buyer's queue to process.</p> <p>3 MR. ROBERTSON: Is there any way to hit it</p> <p>4 without it showing up in a buyer's queue? I'd like</p> <p>5 to see the next screen without -- without actually</p> <p>6 buying an item. Can we --</p> <p>7 MR. YUHASZ: What next screen? What do you</p> <p>8 mean, that the buyer's going to use or --</p> <p>9 MR. ROBERTSON: I'm curious to see what's going</p> <p>10 to happen after you hit checkout.</p> <p>11 MR. YUHASZ: Okay.</p> <p>12 MR. ROBERTSON: What gets displayed?</p> <p>13 MR. YUHASZ: Your requisition number which is</p> <p>14 up there, but it just tells you the requisition</p> <p>15 number is -- is released or processed. That's a</p> <p>16 little -- a small window appears just saying that.</p> <p>17 MR. ROBERTSON: Kind of like Amazon, one click</p> <p>18 shopping at this point? I'm going to click on it;</p> <p>19 we're going to buy it?</p> <p>20 MR. YUHASZ: You click on checkout, yes, it's</p> <p>21 going to be available for going.</p> <p>22 MR. ROBERTSON: How about this? Could we</p> <p>23 delete everything except a paper towel and a --</p> <p>24 MR. STAFFORD: Delete the stents.</p> <p>25 MR. ROBERTSON: -- and a mop and -- delete</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>137</p> <p>1 the -- delete the stents. Delete the -- is that --</p> <p>2 is that paper towel, kitchen, a dollar? Do you mind</p> <p>3 if I -- don't do it yet. It's less than \$5 and a</p> <p>4 mop that's \$8. I'll reimburse you. Can we -- could</p> <p>5 we order those two things?</p> <p>6 MR. CLEMENTS: I think the first paper towel</p> <p>7 item is coming from inventory --</p> <p>8 MR. YUHASZ: Correct, that's what I --</p> <p>9 MR. ROBERTSON: All right. All right. So what</p> <p>10 do we --</p> <p>11 MR. YUHASZ: So I was going to -- do you need a</p> <p>12 job?</p> <p>13 MR. ROBERTSON: All right. Can we go through</p> <p>14 the purchase process?</p> <p>15 MR. YUHASZ: Sorry.</p> <p>16 MR. ROBERTSON: Can we check out?</p> <p>17 MR. YUHASZ: Let me print the screen first.</p> <p>18 MR. ROBERTSON: Oh, thanks.</p> <p>19 MR. STAFFORD: We now have a cart with two</p> <p>20 items in there?</p> <p>21 MR. ROBERTSON: Yes.</p> <p>22 (DISCUSSION OFF THE RECORD)</p> <p>23 MR. ROBERTSON: All right. How can we see the</p> <p>24 purchase order process now?</p> <p>25 MR. YUHASZ: I can move into the Lawson --</p>	<p>139</p> <p>1 that purchase order form.</p> <p>2 MR. YUHASZ: Oh, I may not be able to get to</p> <p>3 production. We are going to have to switch to</p> <p>4 Vicky. As you see, I don't have authorization to do</p> <p>5 that, that function of turning a req to a PO.</p> <p>6 That -- only a buyer can do that, so we have to turn</p> <p>7 that over to Vicky.</p> <p>8 MR. ROBERTSON: Okay. Why don't we take a</p> <p>9 lunch break, and then can we do that after the lunch</p> <p>10 break --</p> <p>11 MR. STAFFORD: Is that okay, Vicky --</p> <p>12 MR. YUHASZ: She needs to get on to it. She</p> <p>13 needs to -- she needs to move through it so buyers</p> <p>14 above -- another buyer's going to handle that in the</p> <p>15 normal daily process and go ahead and pick it up</p> <p>16 before we get to it.</p> <p>17 MR. STAFFORD: Let me ask --</p> <p>18 (DISCUSSION OFF THE RECORD)</p> <p>19 MR. STAFFORD: Are you concerned that we might</p> <p>20 accidentally buy it?</p> <p>21 MR. YUHASZ: That we won't be able to show any</p> <p>22 more processing because a buyer -- a buyer --</p> <p>23 MR. STAFFORD: Oh, because it will move too</p> <p>24 far. So we do need to break to -- so we can come</p> <p>25 back to it? Is that what you're saying?</p>
<p>138</p> <p>1 MR. ROBERTSON: Actually, capture that screen</p> <p>2 that says it's been processed.</p> <p>3 MR. YUHASZ: Right. And if I can -- Vicky, do</p> <p>4 you need -- do you need to get to a buyer to make</p> <p>5 sure they don't grab it.</p> <p>6 MS. WILLIAMS: Write down the req number.</p> <p>7 MR. YUHASZ: Oh, the req number.</p> <p>8 MR. ROBERTSON: Is the req number 202-6997?</p> <p>9 MR. YUHASZ: Correct.</p> <p>10 MR. ROBERTSON: Okay.</p> <p>11 MR. YUHASZ: Okay. And then are we ready to</p> <p>12 exit the requisition self-service?</p> <p>13 MR. ROBERTSON: Yeah.</p> <p>14 MR. YUHASZ: Okay.</p> <p>15 MR. ROBERTSON: What are you typing in there?</p> <p>16 MR. YUHASZ: The PO 100 form is the purchasing</p> <p>17 form that takes processed requisitions over to a PO.</p> <p>18 MR. ROBERTSON: Okay. Could you just capture</p> <p>19 that screen for me?</p> <p>20 MR. YUHASZ: Oh, okay.</p> <p>21 MR. STAFFORD: And this is the portal home</p> <p>22 screen?</p> <p>23 MR. YUHASZ: Yes, back to the portal home</p> <p>24 screen.</p> <p>25 MR. ROBERTSON: All right. Why don't we go to</p>	<p>140</p> <p>1 MR. ROBERTSON: No, we need to do it now, is</p> <p>2 what Vicky's suggesting --</p> <p>3 MR. YUHASZ: Right, we need to do it now --</p> <p>4 MR. ROBERTSON: My suggestion is, why doesn't</p> <p>5 Bill eat and we can continue with Vicky, just</p> <p>6 continue forward the next 20 minutes.</p> <p>7 MR. STAFFORD: Sure, sure. You have to come</p> <p>8 back, Bill.</p> <p>9 MR. YUHASZ: Okay.</p> <p>10 MR. STAFFORD: Will you be able to do some</p> <p>11 screen shots for Mr. Robertson?</p> <p>12 MS. WILLIAMS: Yes. This is a screen where the</p> <p>13 buyers will run their jobs that pulls released</p> <p>14 requisitions for non-stock items for purchase</p> <p>15 orders.</p> <p>16 MR. ROBERTSON: Can you capture that screen?</p> <p>17 Okay. I just want to ask you a couple of questions,</p> <p>18 though, before you do anything else. Says job</p> <p>19 description, PO interface from Lawson. Is that</p> <p>20 purchase order interface?</p> <p>21 MS. WILLIAMS: Yes.</p> <p>22 MR. ROBERTSON: That's interfacing with what?</p> <p>23 The requisition self-service we were just using?</p> <p>24 MS. WILLIAMS: Let me get back to that. And</p> <p>25 the question?</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>141</p> <p>1 MR. ROBERTSON: Job description says PO</p> <p>2 interface from Lawson.</p> <p>3 MS. WILLIAMS: That's the name of this job</p> <p>4 right here, is the name of the form.</p> <p>5 MR. ROBERTSON: Okay.</p> <p>6 MS. WILLIAMS: When we create these, we're just</p> <p>7 copying the name of the form that we're on.</p> <p>8 MR. ROBERTSON: How do I get to that</p> <p>9 requisition that I built? How do I start the</p> <p>10 process of doing the purchase order for those items?</p> <p>11 MS. WILLIAMS: When I submit this job, it's</p> <p>12 going to pull requisitions. If I'm the buyer, it's</p> <p>13 going to pull the requisitions for that buyer. If</p> <p>14 I'm a buyer, I just go in and pull all of my reqs.</p> <p>15 MR. ROBERTSON: Well, how can I find that req</p> <p>16 that we created?</p> <p>17 MS. WILLIAMS: We're going to do this</p> <p>18 particular filter by that one req number to try to</p> <p>19 grab it if the buyer's not already running it.</p> <p>20 MR. ROBERTSON: All right. Were you</p> <p>21 experiencing technical difficulties?</p> <p>22 MS. WILLIAMS: Huh-uh.</p> <p>23 MR. ROBERTSON: All right. I want to capture</p> <p>24 that if I could, please.</p> <p>25 MS. WILLIAMS: This?</p>	<p>143</p> <p>1 to buy.</p> <p>2 MR. ROBERTSON: Okay. And that -- those two</p> <p>3 different items, those were from two different</p> <p>4 vendors, is that right, the mop and the paper</p> <p>5 towels?</p> <p>6 MS. WILLIAMS: Yes, sir.</p> <p>7 MR. ROBERTSON: Okay. Can you capture that for</p> <p>8 me? And I think -- I think we're out of time on the</p> <p>9 videographer, so why don't you just go ahead and</p> <p>10 capture that, and we'll swap out the tape.</p> <p>11 MS. WILLIAMS: Okay.</p> <p>12 MR. ROBERTSON: Save that. Is the purchase</p> <p>13 process over there? Let's go off the record and</p> <p>14 let's change the tape; otherwise, we'll --</p> <p>15 VIDEO TECHNICIAN: Going off the record, the</p> <p>16 time is 12:00.,</p> <p>17 (DISCUSSION OFF THE RECORD)</p> <p>18 VIDEO TECHNICIAN: We're back on the record.</p> <p>19 The time is 12:01.,</p> <p>20 MS. WILLIAMS: This particular item was stocked</p> <p>21 at the NLC logistics center. I would not want to</p> <p>22 push it to a PO, so it's a good thing it caught</p> <p>23 here. I can delete -- I can close this item at this</p> <p>24 point. This item I can change the location and get</p> <p>25 it to go to a PO.</p>
<p>142</p> <p>1 MR. ROBERTSON: This screen. Then I'm informed</p> <p>2 by the videographer that we are running out of tape,</p> <p>3 and so we'll need to change that.</p> <p>4 MR. STAFFORD: And this is a screen called</p> <p>5 req--- requisition inquiry?</p> <p>6 MR. ROBERTSON: Can you -- can you capture that</p> <p>7 document --</p> <p>8 MS. WILLIAMS: Uh-huh.</p> <p>9 MR. ROBERTSON: -- that screen shot on the Word</p> <p>10 document?</p> <p>11 MS. WILLIAMS: The PO lines did not pull to a</p> <p>12 PO. This screen would show you the PO number had</p> <p>13 they pulled to.</p> <p>14 MR. ROBERTSON: Why didn't they do that?</p> <p>15 MS. WILLIAMS: There could be an issue with the</p> <p>16 contract having expired. This screen just really</p> <p>17 gives me the ability to inquire on this particular</p> <p>18 position.</p> <p>19 MR. ROBERTSON: Okay.</p> <p>20 MS. WILLIAMS: And we see these two lines, and</p> <p>21 I'm assuming those are the two lines ordered.</p> <p>22 MR. ROBERTSON: Okay. What does that indicate</p> <p>23 to us?</p> <p>24 MS. WILLIAMS: That it's sitting in the buyer's</p> <p>25 worksheet. It's moved from the req to the ability</p>	<p>144</p> <p>1 MR. ROBERTSON: Okay. Why don't we delete the</p> <p>2 item then from -- that we don't want.</p> <p>3 MR. STAFFORD: That's deleting 147422.</p> <p>4 MS. WILLIAMS: Uh-huh. Do you want a screen</p> <p>5 shot?</p> <p>6 MR. ROBERTSON: Well, I think we had it from</p> <p>7 before. Why don't you just delete it and then take</p> <p>8 a screen shot. So just so it's clear for the</p> <p>9 record, we deleted this purchase order worksheet</p> <p>10 because it wasn't available from a location we</p> <p>11 wanted, correct?</p> <p>12 MS. WILLIAMS: Correct.</p> <p>13 MR. ROBERTSON: Okay. Could I have searched</p> <p>14 for other locations that it was available, that it</p> <p>15 might be available from? I thought you were doing</p> <p>16 that with the capability --</p> <p>17 MS. WILLIAMS: We did. It only showed the</p> <p>18 inventory at the NLC --</p> <p>19 MR. ROBERTSON: But if it was available from</p> <p>20 other manufacturers, I could use that functionality</p> <p>21 to get it?</p> <p>22 MS. WILLIAMS: It would not show other</p> <p>23 manufacturers. It would have shown if it was in</p> <p>24 stock at another location at Novant but not another</p> <p>25 manufacturer.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>145</p> <p>1 MR. ROBERTSON: Why -- why can't I go look at</p> <p>2 another manufacturer? It's just because it's a</p> <p>3 location?</p> <p>4 MS. WILLIAMS: Right. This is showing the</p> <p>5 locations available at Novant to get this item from.</p> <p>6 MR. ROBERTSON: All right.</p> <p>7 MS. WILLIAMS: If it's in inventory, you would</p> <p>8 not have multiple --</p> <p>9 MR. ROBERTSON: This one, this mop that we</p> <p>10 purchased from a particular vendor, correct?</p> <p>11 MS. WILLIAMS: Yes.</p> <p>12 MR. ROBERTSON: Okay. You captured this screen</p> <p>13 shot with only just the one --</p> <p>14 MS. WILLIAMS: I did.</p> <p>15 MR. ROBERTSON: Okay. Thanks.</p> <p>16 MS. WILLIAMS: Right here.</p> <p>17 MR. ROBERTSON: Great. We're going to move now</p> <p>18 forward to the purchase order, correct?</p> <p>19 MS. WILLIAMS: As soon as I change it to the</p> <p>20 location that has it.</p> <p>21 MR. ROBERTSON: Can you capture that screen</p> <p>22 shot before you --</p> <p>23 MR. STAFFORD: She had changed the "ship to";</p> <p>24 is that correct?</p> <p>25 MS. WILLIAMS: Yes, sir. On the purchasing</p>	<p>147</p> <p>1 it will help to add a vendor purchase location which</p> <p>2 tells me the area of the vendor -- which location</p> <p>3 for the vendor. It could be we've picked a very old</p> <p>4 item that hasn't been purchased in a while and has</p> <p>5 no allied contract pricing. Here I'm looking to see</p> <p>6 if maybe anything would tell me the contract was on</p> <p>7 hold. It does not. I can force it to appear from</p> <p>8 here, not taking it through the PO 100 process, and</p> <p>9 we can look at another open item that I can move</p> <p>10 running the open PO 100 process. That's a valid</p> <p>11 item for a buyer. Your choice.</p> <p>12 MR. ROBERTSON: What I'd like to do is go</p> <p>13 through the requisition process, come up with</p> <p>14 another item that we know is going to be available,</p> <p>15 and then source it and then create a PO, but we</p> <p>16 don't -- we can take a lunch break if you'd like,</p> <p>17 and then -- let's go off the record, take our lunch</p> <p>18 break, and I'll talk to you, Mark. I want to wrap</p> <p>19 this up, but I'm --</p> <p>20 MR. STAFFORD: Yeah. One thing that occurred</p> <p>21 to me is, on the lunch break is there a way for you</p> <p>22 or me to check for an item that we know will go all</p> <p>23 the way through?</p> <p>24 MS. WILLIAMS: Here, I can find an item already</p> <p>25 on a req in here, and we can rebuild an entire req</p>
<p>146</p> <p>1 screen, it shows a buyer just for the sake of the</p> <p>2 fact that I need to kill this order before it goes</p> <p>3 out to the vendor. I'm going to change this line to</p> <p>4 me as the buyer. Now we're going to run the PO 100</p> <p>5 again. Can't use Bill's computer.</p> <p>6 MR. ROBERTSON: Need you to capture the</p> <p>7 important screens, Vicky, as you're going through</p> <p>8 this, so let me know --</p> <p>9 MS. WILLIAMS: I will. We've already caught</p> <p>10 this once before. And it still didn't move to a PO.</p> <p>11 Looking for something that might be causing it not</p> <p>12 to. I don't recall if Bill put a date of when you</p> <p>13 would like to receive the products, and that may</p> <p>14 be --</p> <p>15 MR. STAFFORD: So you have added a date?</p> <p>16 MS. WILLIAMS: A date of when we would like to</p> <p>17 receive it.</p> <p>18 MR. STAFFORD: And you've added 2/22/2010?</p> <p>19 MS. WILLIAMS: Yes, sir.</p> <p>20 MR. ROBERTSON: Is it going through?</p> <p>21 MS. WILLIAMS: That's what we're going to</p> <p>22 check.</p> <p>23 MR. ROBERTSON: Do we have success, Vicky?</p> <p>24 MS. WILLIAMS: No, sir, we did not. Want to</p> <p>25 try another location keeping me as a buyer seeing if</p>	<p>148</p> <p>1 and then kill it --</p> <p>2 MR. STAFFORD: And it will step through, it</p> <p>3 sounds like, all the screens we did and -- all</p> <p>4 right. But we'll let you get a bite to eat.</p> <p>5 VIDEO TECHNICIAN: Going off the record, the</p> <p>6 time is 12:12.,</p> <p>7 (RECESS TAKEN)</p> <p>8 VIDEO TECHNICIAN: We're back on the record.</p> <p>9 The time is 12:45.,</p> <p>10 MR. ROBERTSON: All right. We're just going to</p> <p>11 adjust the lighting here for a minute. Thanks.</p> <p>12 Okay. Mr. Yuhasz, could you just go to search</p> <p>13 catalog for me and capture that screen. Okay.</p> <p>14 Capture the screen before you do a search. Great.</p> <p>15 Thank you. Okay. Now, let's search for mop,</p> <p>16 please.</p> <p>17 MR. YUHASZ: Okay.</p> <p>18 MR. ROBERTSON: Capture that screen. Okay.</p> <p>19 I'd like to look in this list for two -- the</p> <p>20 description of two generally equivalent -- doesn't</p> <p>21 need to be identical but generally equivalent items</p> <p>22 that are mops from two different manufacturers, so</p> <p>23 let me see if I can identify that. You got</p> <p>24 Rubbermaid. Can you scroll down for me, see if</p> <p>25 there's anymore? Keep going if you can. Okay.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>149</p> <p>1 What was the one for \$50--- \$55 and one</p> <p>2 for 60, but they're both from Rubbermaid? Scroll</p> <p>3 up. Why don't we do this: Can you do paper towels</p> <p>4 because I thought we had one that would --</p> <p>5 MR. STAFFORD: Excuse me, on the bottom, was</p> <p>6 there another mop handle?</p> <p>7 MR. ROBERTSON: Mop handle for --</p> <p>8 MR. STAFFORD: Mop handle there from one</p> <p>9 manufacturer and there was a mop handle up at the</p> <p>10 top. Just seeing if that might give you what you</p> <p>11 want. Third one down is a mop handle close in</p> <p>12 price. I don't know.</p> <p>13 MR. ROBERTSON: Yeah, why don't you add those</p> <p>14 two. No, no, the one that -- the second one. Is</p> <p>15 that -- oh, yeah. Okay.</p> <p>16 MR. STAFFORD: That's one, and then there's one</p> <p>17 at the very bottom of the scroll is what I was</p> <p>18 suggesting.</p> <p>19 MR. ROBERTSON: All right. Could you also go</p> <p>20 to -- before you -- I want to buy paper towels now.</p> <p>21 MR. GRAHAM: Can you screen capture this before</p> <p>22 you move on?</p> <p>23 MR. ROBERTSON: I'm sorry. Thank you. And</p> <p>24 actually, we buy paper towels -- can we do this:</p> <p>25 Can we go through the UNSPSC the way we did that</p>	<p>151</p> <p>1 MR. ROBERTSON: Okay. Can you capture that</p> <p>2 screen? Can -- go to the description of the second</p> <p>3 one that you've gotten. All right. Why don't we --</p> <p>4 can you just delete one of those mops? Bill,</p> <p>5 what's -- what's line detail? Is that available?</p> <p>6 Okay. And we were online basic; is that right --</p> <p>7 MR. YUHASZ: Correct.</p> <p>8 MR. ROBERTSON: -- before?</p> <p>9 MR. YUHASZ: Right.</p> <p>10 MR. ROBERTSON: Can you go to line comments?</p> <p>11 Just kind of curious with this one. Okay.</p> <p>12 MR. YUHASZ: Do you want a screen shot?</p> <p>13 MR. ROBERTSON: No, that's all right.</p> <p>14 MR. YUHASZ: Okay.</p> <p>15 MR. ROBERTSON: Go back to line basic, if you</p> <p>16 could. I'm sorry. Could you go back to line detail</p> <p>17 so we can get the -- I think when we had the --</p> <p>18 okay. Can you just print that screen? All right.</p> <p>19 I'm done with this exercise.</p> <p>20 The only other one I want to be able to do</p> <p>21 is source product from two different vendors and</p> <p>22 build the purchase order. So you can go through all</p> <p>23 the screen shots if you'd like -- excuse me -- or</p> <p>24 Vicky could till we get to that -- that part,</p> <p>25 however you want to do it.</p>
<p>150</p> <p>1 before?</p> <p>2 MR. YUHASZ: We don't have that enabled in</p> <p>3 production. Let's see.</p> <p>4 MR. ROBERTSON: Will you be adding that to the</p> <p>5 same purchase order?</p> <p>6 MR. YUHASZ: No, I'm trying to get it so I have</p> <p>7 an un-spec search enabled. I don't -- we haven't</p> <p>8 enabled that in production.</p> <p>9 MR. ROBERTSON: All right. Why don't you go</p> <p>10 back, and we'll just do it the old-fashioned way</p> <p>11 with paper towels.</p> <p>12 MR. YUHASZ: Let me see. No, that's not where</p> <p>13 it is. Okay.</p> <p>14 MR. ROBERTSON: There was a towel, kitchen</p> <p>15 paper, and I think there's another towel, kitchen</p> <p>16 paper. May have to go to the next page. Okay. All</p> <p>17 right. Can you go back to the first one? Can you</p> <p>18 just show me the description of the first towel,</p> <p>19 paper kitchen up in the --</p> <p>20 MR. YUHASZ: You want me to capture this</p> <p>21 screen?</p> <p>22 MR. ROBERTSON: Yeah.</p> <p>23 MR. YUHASZ: This one?</p> <p>24 MR. ROBERTSON: Yeah.</p> <p>25 MR. YUHASZ: Thanks.</p>	<p>152</p> <p>1 MR. YUHASZ: So what item would you suggest</p> <p>2 ordering, Vicky?</p> <p>3 MR. ROBERTSON: Well, why don't you capture</p> <p>4 that first, the screen shot, so we can see the</p> <p>5 universe of what we're searching, what we're going</p> <p>6 to purchase. I need two non-inventory items from</p> <p>7 two different vendors.</p> <p>8 MR. YUHASZ: So I suggest the Provon dispenser</p> <p>9 and the cover seat.</p> <p>10 MR. ROBERTSON: Okay. So why don't you capture</p> <p>11 that. So the next thing would be to proceed to the</p> <p>12 purchase order process?</p> <p>13 MR. STAFFORD: Ms. Williams is making a note of</p> <p>14 the, what, req number?</p> <p>15 MS. WILLIAMS: Yes, sir.</p> <p>16 MR. STAFFORD: All right.</p> <p>17 MS. WILLIAMS: Didn't move the key in. That</p> <p>18 was -- was that the req builder? Can anyone make</p> <p>19 out the req number? Can't see that.</p> <p>20 MR. ROBERTSON: Can you see it over there?</p> <p>21 MS. WILLIAMS: You didn't release it?</p> <p>22 MR. YUHASZ: Oh, I'm sorry.</p> <p>23 MS. WILLIAMS: That's okay. What we're seeing</p> <p>24 here is req released status, so while I might not go</p> <p>25 back to RQ RSS to release it, I can go in and</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>153</p> <p>1 release this so we can move it to a PO. But</p> <p>2 normally this will enable us to go ahead and release</p> <p>3 this and move it to a PO. Do you want me to screen</p> <p>4 print this for you?</p> <p>5 MR. ROBERTSON: Sure.</p> <p>6 MS. WILLIAMS: Okay. It's much better than it</p> <p>7 could be. Oh, I'm sorry. Well, I do know what we</p> <p>8 can do. All I'm doing is making sure that it is at</p> <p>9 the right location. No.</p> <p>10 MR. ROBERTSON: Any idea why?</p> <p>11 MS. WILLIAMS: It could be that the contract's</p> <p>12 expired, that the pricing's no longer valid for it.</p> <p>13 I will definitely want to kill it, but we could go</p> <p>14 in and build an order for two lines from two</p> <p>15 different vendors through RSS for an area that I</p> <p>16 know their products are active and in use.</p> <p>17 MR. ROBERTSON: If you could do that, I just</p> <p>18 need to generate a purchase order.</p> <p>19 MS. WILLIAMS: Okay. Bill, any ideas? The</p> <p>20 problem I'm going to run into is if I use my</p> <p>21 location some of these expense accounts that we're</p> <p>22 trying to use may not be mapped from my location</p> <p>23 through the finance department, and I can't order</p> <p>24 just certain, you know, items.</p> <p>25 MR. ROBERTSON: Well, why don't we see the</p>	<p>155</p> <p>1 pieces. What we're looking for is an order that's</p> <p>2 going to have multiple vendors on the same req.</p> <p>3 MR. ROBERTSON: Well, how can you tell if it</p> <p>4 does or not?</p> <p>5 MS. WILLIAMS: I'm doing a req inquiry, and</p> <p>6 here's the requested vendor, so I'm looking for an N</p> <p>7 type item -- that would mean it would come</p> <p>8 externally -- with different vendors on the same</p> <p>9 req. Here's an example, but these are in inventory</p> <p>10 at the NLC, so it's difficult. This particular case</p> <p>11 has all the same supplier. These are all inventory.</p> <p>12 Here's an -- well, this is inventory, but this is a</p> <p>13 good example --</p> <p>14 MR. ROBERTSON: Are -- I'm sorry. Let me ask</p> <p>15 you this question: Does the RSS Lawson application</p> <p>16 permit you to search for items that are</p> <p>17 non-inventory items from two separate vendors and</p> <p>18 build a purchase order for the -- those two vendors?</p> <p>19 MS. WILLIAMS: To build a --</p> <p>20 MR. ROBERTSON: Purchase order.</p> <p>21 MS. WILLIAMS: You can build one req that goes</p> <p>22 to two PO's.</p> <p>23 MR. ROBERTSON: Okay. So the PO's are split</p> <p>24 apart because there's two separate vendors?</p> <p>25 MS. WILLIAMS: Yes, sir.</p>
<p>154</p> <p>1 items that you're authorized for you can order. I</p> <p>2 thought that was, you know, your department.</p> <p>3 MS. WILLIAMS: Right, and it may not be</p> <p>4 accounting that's blocking those items. Let's go</p> <p>5 back to -- it shows it's from JanPak. There's not a</p> <p>6 contract agreement on it. Item's from Owen &amp; Minor,</p> <p>7 and normally it would move smoothly to a PO unless</p> <p>8 there were issues.</p> <p>9 MR. ROBERTSON: There's no --</p> <p>10 MS. WILLIAMS: Well, I think those were no</p> <p>11 charge anyway, so those were no-charge products.</p> <p>12 Make sure I don't have any filters on it because</p> <p>13 it -- I can show you an order that a customer has</p> <p>14 entered. We can look at their shopping list.</p> <p>15 MR. ROBERTSON: Okay. If you have an example</p> <p>16 of an order that has two different items from two</p> <p>17 different vendors, I'd like to capture that and</p> <p>18 maybe just ask you a couple of questions.</p> <p>19 MS. WILLIAMS: Okay. What I'm doing here is</p> <p>20 trying to find a req that has multiple items on it</p> <p>21 from multiple vendors for active buyers. Looking</p> <p>22 for different multiple items on one req. Here's one</p> <p>23 that it's the same vendor, two items. One thing,</p> <p>24 our buyers do stay up getting their orders out.</p> <p>25 Let's do this: I just cannot drop in</p>	<p>156</p> <p>1 MR. ROBERTSON: And RSS permits you to do that,</p> <p>2 notwithstanding the authorization glitches we're</p> <p>3 having here today?</p> <p>4 MS. WILLIAMS: Right.</p> <p>5 MR. ROBERTSON: Okay. Well, I think we've</p> <p>6 given it the college try at this point. Do you --</p> <p>7 do you -- can you tell me why you think it's not</p> <p>8 functioning properly today?</p> <p>9 MS. WILLIAMS: The reason why -- the items that</p> <p>10 I'm trying to order, if I were to try to order an</p> <p>11 ICD for my area, my accounting restrictions block me</p> <p>12 from ordering ICD's for my cost center.</p> <p>13 MR. ROBERTSON: What -- what's an ICD?</p> <p>14 MS. WILLIAMS: An enter -- like a pacemaker.</p> <p>15 MR. ROBERTSON: Okay.</p> <p>16 MS. WILLIAMS: Yeah, an ICD device. If I were</p> <p>17 to try to buy stents even to show you, I'm not</p> <p>18 authorized by finance for my budget to order --</p> <p>19 MR. ROBERTSON: Okay. So -- I'm sorry, I</p> <p>20 didn't mean to interrupt. So you're not authorized</p> <p>21 to buy those types of things. You have buyers who</p> <p>22 are authorized to buy those types of items from</p> <p>23 different vendors, correct?</p> <p>24 MS. WILLIAMS: Right.</p> <p>25 MR. ROBERTSON: And take one requisition and</p>

<p>157</p> <p>1 build a purchase order to those two separate</p> <p>2 vendors, correct?</p> <p>3 MS. WILLIAMS: Uh-huh.</p> <p>4 MR. ROBERTSON: Okay.</p> <p>5 MS. WILLIAMS: But the RSS restricts me by</p> <p>6 being the items that are in my budget to be able to</p> <p>7 buy that I have access to linked to my cost center,</p> <p>8 so if I -- if I do a straight PO, I could order</p> <p>9 those. Through RSS, it might block it.</p> <p>10 MR. ROBERTSON: We were looking at -- earlier</p> <p>11 at the test model that you had. Could you build a</p> <p>12 purchase order from two separate matters on that</p> <p>13 test model, or we -- we couldn't get there?</p> <p>14 MR. YUHASZ: Well, it was -- it was totally off</p> <p>15 the mark with what it was in RSS.</p> <p>16 MS. WILLIAMS: Right here.</p> <p>17 MR. YUHASZ: The test system was not working</p> <p>18 properly to -- to demonstrate.</p> <p>19 MR. ROBERTSON: So we couldn't move to a</p> <p>20 purchase order there?</p> <p>21 MS. WILLIAMS: Well, this is mine. We just</p> <p>22 found one that -- this is one that I need to kill</p> <p>23 that we just entered, but I can't get it to move to</p> <p>24 a PO.</p> <p>25 MR. ROBERTSON: Okay. All right. Why don't --</p>	<p>159</p> <p>1 EXAMINATION</p> <p>2 MR. GRAHAM: Bill, when did -- when was the</p> <p>3 Lawson system first implemented onto Novant's -- at</p> <p>4 Novant?</p> <p>5 MR. YUHASZ: The first production</p> <p>6 implementation was March 1999.</p> <p>7 MR. GRAHAM: And when the Lawson system first</p> <p>8 was given to Novant, did it include any items in the</p> <p>9 item master?</p> <p>10 MR. YUHASZ: No.</p> <p>11 MR. GRAHAM: How did those items get out into</p> <p>12 the item master?</p> <p>13 MR. YUHASZ: They're added by Novant personnel.</p> <p>14 MR. GRAHAM: And what's -- what's the process</p> <p>15 for adding an item to the item master, generally?</p> <p>16 MR. YUHASZ: A request is made, and it is</p> <p>17 forwarded to sourcing to ensure it's contracted or</p> <p>18 not. And then when they approve it for purchase,</p> <p>19 then an item is set up in the item master for</p> <p>20 ordering.</p> <p>21 MR. GRAHAM: I believe you testified that</p> <p>22 associated with the item in the item master you may</p> <p>23 have text descriptions, as well as images.</p> <p>24 MR. YUHASZ: Correct.</p> <p>25 MR. GRAHAM: How do you decide what textual</p>
<p>158</p> <p>1 MS. WILLIAMS: And it's been several years</p> <p>2 since I've ordered those products, so many things</p> <p>3 could have happened.</p> <p>4 MR. ROBERTSON: Let me ask you this: You see</p> <p>5 the URL address up there, HTTP [colon] [forward</p> <p>6 slash] [forward slash] LAWHA [dot] Novant Health</p> <p>7 [dot] org? See that? Is this -- Lawson has</p> <p>8 downloaded the software onto the Novant servers; is</p> <p>9 that correct?</p> <p>10 MR. YUHASZ: Well, the Novant IT team has</p> <p>11 installed it on Novant's servers, in-house Novant's</p> <p>12 servers --</p> <p>13 MR. ROBERTSON: Okay. Lawson also does hosted</p> <p>14 searching for some of its customers, and this isn't</p> <p>15 a hosted search?</p> <p>16 MR. YUHASZ: This is not a hosted search from</p> <p>17 Lawson, correct.</p> <p>18 MR. ROBERTSON: I guess with that, I appreciate</p> <p>19 your efforts. I have no further questions.</p> <p>20 (DISCUSSION OFF THE RECORD)</p> <p>21 VIDEO TECHNICIAN: Going off the record, the</p> <p>22 time is 13:13.,</p> <p>23 (DISCUSSION OFF THE RECORD)</p> <p>24 VIDEO TECHNICIAN: We're back on the record.</p> <p>25 The time is 13:15.,</p>	<p>160</p> <p>1 information you're going to add to the item master</p> <p>2 for the item?</p> <p>3 MR. YUHASZ: Because of the limitation of 30</p> <p>4 characters in the Lawson system, we have -- we've</p> <p>5 got a standard format of noun [comma] and then the</p> <p>6 best descriptive unique information for that item,</p> <p>7 and we have to use mnemonics or abbreviations for a</p> <p>8 lot of the descriptive content.</p> <p>9 MR. GRAHAM: Did you get that textual</p> <p>10 information from a vendor/supplier catalog?</p> <p>11 MR. YUHASZ: Again, I'll have to question</p> <p>12 the -- the wording of "vendor catalog." We receive</p> <p>13 it from the manufacturer upon contract award. We</p> <p>14 receive the information from the supplier, and from</p> <p>15 that we deem what would be the best Lawson</p> <p>16 description to put for that item when we add it to</p> <p>17 the item master.</p> <p>18 MR. GRAHAM: So Novant creates their own</p> <p>19 textual description based on what the supplier gave</p> <p>20 you?</p> <p>21 MR. YUHASZ: Correct.</p> <p>22 MR. GRAHAM: And does -- did Lawson give you</p> <p>23 any instruction on how to set up that textual</p> <p>24 information?</p> <p>25 MR. YUHASZ: I can't remember way back then,</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>161</p> <p>1 but, I mean, we have had that format for a long</p> <p>2 time, so we may have gotten some advice, but</p> <p>3 ultimately it was us coming up with the ultimate</p> <p>4 format for the description.</p> <p>5 MR. GRAHAM: You also testified that</p> <p>6 occasionally images are associated with items in the</p> <p>7 item master?</p> <p>8 MR. YUHASZ: Yes.</p> <p>9 MR. GRAHAM: And those images are created by</p> <p>10 Novant; is that correct?</p> <p>11 MR. YUHASZ: Correct.</p> <p>12 MR. GRAHAM: And does Novant ever use images</p> <p>13 provided to them by a vendor?</p> <p>14 MR. YUHASZ: We have -- we do have a few like</p> <p>15 that where the vendors' Web picture is a JPG. If</p> <p>16 it's not in JPG format, it can't be done. And so a</p> <p>17 lot of -- being specific here -- a lot of the</p> <p>18 vendor's Web sites are like HTML, and it's got</p> <p>19 description, item content, all that stuff. We can</p> <p>20 just take a picture image, and it has to be in that</p> <p>21 format first to take it from a -- a supplier's Web</p> <p>22 site.</p> <p>23 MR. GRAHAM: Okay. Do you ever import supplier</p> <p>24 catalogs into the item master?</p> <p>25 MR. ROBERTSON: Objection, calls for a legal</p>	<p>163</p> <p>1 MR. YUHASZ: No.</p> <p>2 MR. GRAHAM: Bill, if I could have you look at</p> <p>3 Exhibit 7, it's the supply chain ambulatory care.</p> <p>4 Mr. Robertson asked you some questions on page 31.</p> <p>5 If you could turn there specifically looking at the</p> <p>6 category under backorder.</p> <p>7 MR. YUHASZ: Yes.</p> <p>8 MR. GRAHAM: How does Novant determine how many</p> <p>9 and if an item is backordered?</p> <p>10 MR. YUHASZ: I really don't have the knowledge</p> <p>11 to answer that. It's -- it's a delivered Lawson</p> <p>12 report, which you can see the form number is PO 134,</p> <p>13 so it's -- Lawson functionality is doing it.</p> <p>14 MR. GRAHAM: When did -- when did Novant issue</p> <p>15 the RFP for that P2P RFP that we were discussing</p> <p>16 earlier today?</p> <p>17 MR. YUHASZ: I take it from the documentation</p> <p>18 reviewed today that it was probably delivered in</p> <p>19 2009.</p> <p>20 MR. GRAHAM: And you received responses from</p> <p>21 ePlus and from Ariba and a combination of Lawson and</p> <p>22 SciQuest?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. GRAHAM: Did Lawson by itself submit a</p> <p>25 response to the RFP?</p>
<p>162</p> <p>1 conclusion.</p> <p>2 MR. STAFFORD: You go ahead and answer if you</p> <p>3 can.</p> <p>4 THE DEPONENT: No.</p> <p>5 MR. GRAHAM: Mr. Robertson today was showing on</p> <p>6 part of the demo drilling down using the UNSPSC</p> <p>7 codes, and I believe you testified that is not</p> <p>8 currently implemented at Novant; is that correct?</p> <p>9 MR. YUHASZ: Correct, in the production system.</p> <p>10 MR. GRAHAM: Why is it not implemented yet in</p> <p>11 the production system?</p> <p>12 MR. YUHASZ: We are just now fully gathering</p> <p>13 the items and assigning the categorization to the</p> <p>14 items with un-spec.</p> <p>15 MR. GRAHAM: And who assigns the -- the items</p> <p>16 to a particular code?</p> <p>17 MR. YUHASZ: Currently, we have a third-party</p> <p>18 data management service.</p> <p>19 MR. GRAHAM: Has Lawson ever assisted Novant in</p> <p>20 associating a particular UNSPSC code to an item?</p> <p>21 MR. YUHASZ: No.</p> <p>22 MR. GRAHAM: Did Novant have the ability to</p> <p>23 drill down using the UNSPSC codes prior to the</p> <p>24 implementation of the requisition self-service</p> <p>25 module?</p>	<p>164</p> <p>1 MR. YUHASZ: No.</p> <p>2 MR. GRAHAM: In 2009, you already had the ERP</p> <p>3 from Lawson, as well as the RSS for Lawson?</p> <p>4 MR. YUHASZ: Correct.</p> <p>5 MR. GRAHAM: Generally, if you know, what</p> <p>6 functionality was Novant looking for in the RFP that</p> <p>7 it didn't already have from Lawson?</p> <p>8 MR. YUHASZ: Primarily a better customer</p> <p>9 interface, meaning what we are calling -- what we</p> <p>10 would call the Amazon [dot] com experience where</p> <p>11 it's easier to search, easier to find the items.</p> <p>12 For a particular customer that meet their needs,</p> <p>13 have it -- have an overall view for that customer of</p> <p>14 their items and -- and, again as we said before, the</p> <p>15 classification and all of that that went with it.</p> <p>16 MR. GRAHAM: Were you a part of the review</p> <p>17 process for the responses to the RFP?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. GRAHAM: And it's your understanding that</p> <p>20 the combination of Lawson and SciQuest responded</p> <p>21 with functionality that was -- some provided by</p> <p>22 Lawson and some provided by SciQuest?</p> <p>23 MR. YUHASZ: Correct.</p> <p>24 MR. GRAHAM: If -- if you know, would the</p> <p>25 functionality provided only by Lawson have met the</p>

<p>1 requirement of the RFP?</p> <p>2 MR. YUHASZ: I would not be able to answer that</p> <p>3 because they didn't submit the answers to the RFP by</p> <p>4 themselves.</p> <p>5 MR. GRAHAM: Mr. Roberts took you through --</p> <p>6 MR. ROBERTSON: Mr. Robertson, by the way --</p> <p>7 MR. GRAHAM: Oh, I'm sorry, Mr. Robertson.</p> <p>8 I've been saying it wrong.</p> <p>9 Mr. Robertson took you through the demo</p> <p>10 system or the production system.</p> <p>11 MR. YUHASZ: Yes.</p> <p>12 MR. GRAHAM: When you do a search, are you</p> <p>13 searching the entire item master?</p> <p>14 MR. ROBERTSON: Objection, calls for a legal</p> <p>15 conclusion.</p> <p>16 MR. YUHASZ: Yes, when -- when we did the</p> <p>17 search catalog, that is searching the entire item</p> <p>18 master.</p> <p>19 MR. GRAHAM: Is there any way to search just a</p> <p>20 portion of the item master?</p> <p>21 MR. ROBERTSON: Same objection.</p> <p>22 THE DEPONENT: Well, we saw the one by</p> <p>23 categories. I'm not sure of the filters you can</p> <p>24 apply to a search catalog.</p> <p>25 MR. GRAHAM: Well, we also looked at some --</p>	<p>165</p> <p>1 question he just asked you about punch-out.</p> <p>2 FURTHER EXAMINATION</p> <p>3 MR. ROBERTSON: Did I understand you to say it</p> <p>4 was only done for office supply items at one point</p> <p>5 in time?</p> <p>6 MR. YUHASZ: It was only considered --</p> <p>7 MR. ROBERTSON: Oh, I see --</p> <p>8 MR. YUHASZ: It was -- it was what brought it</p> <p>9 up as a possible use for punch-out, but the business</p> <p>10 case didn't -- didn't make it.</p> <p>11 MR. ROBERTSON: Were you asked about generally</p> <p>12 equivalent items and whether or not you could</p> <p>13 determine whether items were generally equivalent by</p> <p>14 using the Lawson RSS system? Do you recall that?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: And I wrote down your answer.</p> <p>17 You said, I don't know how to do it. Is that</p> <p>18 because you're not equipped to determine whether one</p> <p>19 stent, for example, is equivalent to another stent</p> <p>20 because that would depend on some sort of medical</p> <p>21 knowledge?</p> <p>22 MR. YUHASZ: That's one reason, but it's</p> <p>23 also -- you know, there's various reasons on -- such</p> <p>24 as some supplies only go to certain equipment we</p> <p>25 have or equipment at a certain facility. So as an</p>
<p>166</p> <p>1 some search results, for instance, with the stents</p> <p>2 that created a list of items. Is there any way in</p> <p>3 the Lawson system to determine which of those items</p> <p>4 are generally equivalent?</p> <p>5 MR. ROBERTSON: Objection, calls for legal</p> <p>6 conclusion.</p> <p>7 MR. YUHASZ: I do not know how.</p> <p>8 MR. GRAHAM: Do you know why the combination of</p> <p>9 Lawson and SciQuest did not win the RFP?</p> <p>10 MR. YUHASZ: It was based on vendor scoring</p> <p>11 from the demos, and -- and Ariba had a better</p> <p>12 weighted score.</p> <p>13 MR. GRAHAM: Okay. Novant has punch-out, just</p> <p>14 not implemented punch-out, correct?</p> <p>15 MR. YUHASZ: Correct.</p> <p>16 MR. GRAHAM: Why doesn't Novant have</p> <p>17 implemented punch-out?</p> <p>18 MR. YUHASZ: It was only considered in one</p> <p>19 instance that I'm aware, and that was for office</p> <p>20 supply ordering, and it was -- it was determined</p> <p>21 that the -- introducing a lot of line item detail</p> <p>22 for very small -- for low cost items generating all</p> <p>23 those transactions wasn't worth implementing it.</p> <p>24 MR. GRAHAM: That's all I have.</p> <p>25 MR. ROBERTSON: Let me start with the last</p>	<p>167</p> <p>1 example, I can show you that Provon dispenser and</p> <p>2 that Perrell dispenser, depending on which one the</p> <p>3 facility uses, you know, even though they're the</p> <p>4 same thing, they're not -- you know, they would have</p> <p>5 to switch out those things.</p> <p>6 MR. ROBERTSON: Let's just stick with stents,</p> <p>7 for example --</p> <p>8 MR. YUHASZ: Uh-huh.</p> <p>9 MR. ROBERTSON: Assuming there's a</p> <p>10 sophisticated user of the system --</p> <p>11 MR. YUHASZ: Uh-huh.</p> <p>12 MR. ROBERTSON: -- a doctor, for example,</p> <p>13 understands, couldn't a doctor look at one</p> <p>14 description and say that's equivalent to a stent,</p> <p>15 having another description based on what's in the</p> <p>16 Lawson system?</p> <p>17 MR. YUHASZ: I would -- it would be best if</p> <p>18 they could, but if they could do it using the</p> <p>19 information shown in RSS, I couldn't answer that.</p> <p>20 MR. ROBERTSON: Okay. How about something</p> <p>21 simple, though, like paper towels? I mean, if we're</p> <p>22 looking at paper towels from one source and paper</p> <p>23 towels from another source, paper towels are paper</p> <p>24 towels, aren't they?</p> <p>25 MR. YUHASZ: Well, when you get into sourcing,</p>
<p>168</p>	<p>168</p>

<p>169</p> <p>1 they aren't. Is -- the only thing I can say is, the</p> <p>2 thickness of them, the size, again what equipment's</p> <p>3 at the facilities and whether, you know, you're</p> <p>4 going to switch all those that's in there, so it</p> <p>5 goes into a lot as to whether it's truly equivalent</p> <p>6 that can -- that can be used as a replacement for a</p> <p>7 certain item, I guess.</p> <p>8 MR. ROBERTSON: Okay. So you're -- you're hung</p> <p>9 up on what's generally equivalent; is that right?</p> <p>10 MR. YUHASZ: Yes.</p> <p>11 MR. ROBERTSON: Okay. We saw other examples of</p> <p>12 mops. I mean, you think, you know, people are</p> <p>13 really that discerning about what kind of mop</p> <p>14 they're going to use? Let me ask it a different</p> <p>15 way. Couldn't I read the description of one mop and</p> <p>16 read the description of another mop and make the</p> <p>17 determination based on the Lawson system that either</p> <p>18 one can be utilized?</p> <p>19 MR. YUHASZ: For -- for some very simple</p> <p>20 commodity type items, yes, I would agree.</p> <p>21 MR. ROBERTSON: Well, let's take a look at</p> <p>22 other items. I mean, you know, do you sell beakers</p> <p>23 at all, you know, those little glass pyrex things</p> <p>24 that hold liquids?</p> <p>25 MR. STAFFORD: Object to form. Go ahead.</p>	<p>171</p> <p>1 manufacturer B?</p> <p>2 MR. YUHASZ: The quality --</p> <p>3 MS. WILLIAMS: Heat resistance --</p> <p>4 MR. YUHASZ: -- how the -- how it holds up</p> <p>5 under the situations. I mean, it -- it -- they</p> <p>6 really get down to very particular attributes of --</p> <p>7 of the supply.</p> <p>8 MR. ROBERTSON: When you indicated that -- you</p> <p>9 were asked a question about when Novant loaded data</p> <p>10 into the item master in the Lawson software, do you</p> <p>11 recall that?</p> <p>12 MR. YUHASZ: Yes.</p> <p>13 MR. ROBERTSON: Before you had the Lawson</p> <p>14 software, did Novant know how to load the item</p> <p>15 information into the item master before you ever</p> <p>16 purchased it?</p> <p>17 MR. YUHASZ: No.</p> <p>18 MR. ROBERTSON: Okay. And you learned that --</p> <p>19 you learned how to load it into the item master by</p> <p>20 Novant providing you instructions on how to do that,</p> <p>21 correct? Excuse me, let me restate that. I</p> <p>22 misstated it.</p> <p>23 You learned how to load item data into the</p> <p>24 item master by Lawson providing you instruction on</p> <p>25 how to do that?</p>
<p>170</p> <p>1 MR. ROBERTSON: Isn't that, what, surgical</p> <p>2 medical supply, beakers, test tubes?</p> <p>3 MR. YUHASZ: I -- again, we don't sell --</p> <p>4 MR. ROBERTSON: All right. Sorry --</p> <p>5 MR. YUHASZ: So, again, we purchase.</p> <p>6 MR. ROBERTSON: To purchase -- to purchase.</p> <p>7 MR. YUHASZ: But we -- we probably have some.</p> <p>8 I couldn't say for sure --</p> <p>9 MR. ROBERTSON: Okay. But if I have a</p> <p>10 500-milliliter beaker from one manufacturer and a</p> <p>11 500-milliliter beaker from another manufacturer, a</p> <p>12 simple little glass vessel, you don't think those</p> <p>13 are equivalent?</p> <p>14 MR. YUHASZ: I don't think you can make such a</p> <p>15 broad assumption. It depends upon the use of them,</p> <p>16 the appli--- the clinical application. It gets --</p> <p>17 MR. ROBERTSON: It's a glass cup of the same</p> <p>18 volume. They wouldn't be -- they wouldn't be</p> <p>19 similar in your view?</p> <p>20 MR. YUHASZ: You'd -- we -- we'd make sure that</p> <p>21 it has a clinical review.</p> <p>22 MR. ROBERTSON: I understand that, but you</p> <p>23 know, can you tell me right now the difference you</p> <p>24 would have for a 500-milliliter beaker from</p> <p>25 manufacturer A and 500-milliliter beaker from</p>	<p>172</p> <p>1 MR. YUHASZ: Actually, for the initial</p> <p>2 implementation, we had a third party.</p> <p>3 MR. ROBERTSON: Who would that be?</p> <p>4 MR. YUHASZ: Bowray (ph).</p> <p>5 MR. ROBERTSON: Okay. Are you aware that there</p> <p>6 are -- I'm sorry. Are you aware that they're a</p> <p>7 subcontractor of Lawson? If you are -- if you're</p> <p>8 not, fine.</p> <p>9 MR. YUHASZ: I couldn't be for sure --</p> <p>10 MR. ROBERTSON: Okay.</p> <p>11 MR. YUHASZ: -- but I would think maybe they --</p> <p>12 they were at least permitted --</p> <p>13 MR. ROBERTSON: Do you --</p> <p>14 MR. YUHASZ: -- to do that through --</p> <p>15 MR. ROBERTSON: Were you ever provided</p> <p>16 instruction manuals and guides as to how to load the</p> <p>17 item master by Lawson?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Okay. Have you ever utilized</p> <p>20 those guides?</p> <p>21 MR. YUHASZ: Yes.</p> <p>22 MR. ROBERTSON: Okay. I have no further</p> <p>23 questions. Thank you.</p> <p>24 MR. STAFFORD: Are you through?</p> <p>25 MR. GRAHAM: We're done.</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>173</p> <p>1 MR. ROBERTSON: All right.</p> <p>2 MR. STAFFORD: The representatives will read</p> <p>3 and sign. Thank you.</p> <p>4 VIDEO TECHNICIAN: This completes the --</p> <p>5 30(b)(6) deposition of William Ray Yuhasz and</p> <p>6 Vicky Williams. The number of tapes used were four.</p> <p>7 Going off the record, the time is 13:34.,</p> <p>8 (EXHIBIT NUMBER N15 WAS MARKED FOR IDENTIFICATION.)</p> <p>9 (SIGNATURE RESERVED)</p> <p>10 (DEPOSITION CONCLUDED AT 1:34 P.M.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>175</p> <p>1 STATE OF NORTH CAROLINA</p> <p>2 COUNTY OF FORSYTH</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 I, Dorothy J. M. McGrath, RPR, a Notary</p> <p>6 Public, do hereby certify that there came before me</p> <p>7 on Friday, February 19, 2010, the person</p> <p>8 hereinbefore named who was by me duly sworn to</p> <p>9 testify to the truth and nothing but the truth of</p> <p>10 his or her knowledge concerning the matters in</p> <p>11 controversy in this cause; that the witness was</p> <p>12 thereupon examined under oath, the examination</p> <p>13 reduced to typewriting under my direction, and the</p> <p>14 deposition is a true record of the testimony given</p> <p>15 by the witness.</p> <p>16 I further certify that I am neither</p> <p>17 attorney or counsel for, nor related to, or employed</p> <p>18 by any attorney or counsel employed by the parties</p> <p>19 hereto or financially interested in the action.</p> <p>20 IN WITNESS WHEREOF, I have hereto set my</p> <p>21 hand this 26th day of February, 2010.</p> <p>22</p> <p>23 _____</p> <p>24 Dorothy J. M. McGrath, Notary Public</p> <p>25 Notary Public Number 20030710028</p>
<p>174</p> <p>1 STATE OF NORTH CAROLINA</p> <p>2 COUNTY OF FORSYTH</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 I, Dorothy J. M. McGrath, RPR, a Notary</p> <p>6 Public, do hereby certify that there came before me</p> <p>7 on Friday, February 19, 2010, the person</p> <p>8 hereinbefore named who was by me duly sworn to</p> <p>9 testify to the truth and nothing but the truth of</p> <p>10 his or her knowledge concerning the matters in</p> <p>11 controversy in this cause; that the witness^ was</p> <p>12 thereupon examined under oath, the examination</p> <p>13 reduced to typewriting under my direction, and the</p> <p>14 deposition is a true record of the testimony given</p> <p>15 by the witness^.</p> <p>16 I further certify that I am neither</p> <p>17 attorney or counsel for, nor related to, or employed</p> <p>18 by any attorney or counsel employed by the parties</p> <p>19 hereto or financially interested in the action.</p> <p>20 IN WITNESS WHEREOF, I have hereto set my</p> <p>21 hand this 26th day of February, 2010.</p> <p>22</p> <p>23 _____</p> <p>24 Dorothy J. M. McGrath, Notary Public</p> <p>25 Notary Public Number 20030710028</p>	<p>176</p> <p>1 WITNESS'S CERTIFICATE</p> <p>2</p> <p>3 I, WILLIAM RAY YUHASZ, do hereby certify</p> <p>4 that I have read and understand the foregoing</p> <p>5 transcript and believe it to be a true, accurate, and</p> <p>6 complete transcript of my testimony, subject to</p> <p>7 the attached list of changes, if any.</p> <p>8</p> <p>9 _____</p> <p>10 WILLIAM RAY YUHASZ</p> <p>11</p> <p>12 This deposition was signed in my presence by</p> <p>13 _____, on the ____ day of</p> <p>14 _____, 2010.</p> <p>15</p> <p>16 _____</p> <p>17 Notary Public</p> <p>18 My commission expires:</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

William Yuhasz and Vicky Williams (Novant) 2/19/2010 8:42:00 AM

<p>177</p> <p>1 (Page 1 of 2)</p> <p>2</p> <p>3 ERRATA SHEET</p> <p>4 Re: ePlus Inc. vs. Perfect Commerce, Inc., et al.</p> <p>5 Deposition of: WILLIAM RAY YUHASZ</p> <p>6 Please read this transcript with care, and if</p> <p>7 you find any corrections or changes you wish made, list</p> <p>8 them by page and line number below. DO NOT WRITE IN</p> <p>9 THE TRANSCRIPT ITSELF. Return the</p> <p>10 Certificate and Errata Sheet to this office after</p> <p>11 it is signed. We would appreciate your prompt</p> <p>12 attention to this matter.</p> <p>13 To assist you in making any such corrections,</p> <p>14 please use the form below. If supplemental or</p> <p>15 additional pages are necessary, please furnish same and</p> <p>16 attach them to the errata sheet.</p> <p>17 Page ____ Line ____ should</p> <p>18 read: _____</p> <p>19 Page ____ Line ____ should</p> <p>20 read: _____</p> <p>21 Page ____ Line ____ should</p> <p>22 read: _____</p> <p>23 Page ____ Line ____ should</p> <p>24 read: _____</p> <p>25</p>	<p>179</p> <p>1 WITNESS'S CERTIFICATE</p> <p>2</p> <p>3 I, VICKY MILLER WILLIAMS, do hereby certify</p> <p>4 that I have read and understand the foregoing</p> <p>5 transcript and believe it to be a true, accurate, and</p> <p>6 complete transcript of my testimony, subject to</p> <p>7 the attached list of changes, if any.</p> <p>8</p> <p>9 _____</p> <p>10 VICKY MILLER WILLIAMS</p> <p>11</p> <p>12 This deposition was signed in my presence by</p> <p>13 _____, on the ____ day of</p> <p>14 _____, 2010.</p> <p>15</p> <p>16 _____</p> <p>17 Notary Public</p> <p>18 My commission expires:</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>178</p> <p>1 Page ____ Line ____ should (Page 2 of 2)</p> <p>2 read: _____</p> <p>3 Page ____ Line ____ should</p> <p>4 read: _____</p> <p>5 Page ____ Line ____ should</p> <p>6 read: _____</p> <p>7 Page ____ Line ____ should</p> <p>8 read: _____</p> <p>9 Page ____ Line ____ should</p> <p>10 read: _____</p> <p>11 Page ____ Line ____ should</p> <p>12 read: _____</p> <p>13 Page ____ Line ____ should</p> <p>14 read: _____</p> <p>15 Page ____ Line ____ should</p> <p>16 read: _____</p> <p>17 Page ____ Line ____ should</p> <p>18 read: _____</p> <p>19 Page ____ Line ____ should</p> <p>20 read: _____</p> <p>21 Page ____ Line ____ should</p> <p>22 read: _____</p> <p>23 Page ____ Line ____ should</p> <p>24 read: _____</p> <p>25</p>	<p>180</p> <p>1 (Page 1 of 2)</p> <p>2</p> <p>3 ERRATA SHEET</p> <p>4 Re: ePlus Inc. vs. Perfect Commerce, Inc., et al.</p> <p>5 Deposition of: VICKY MILLER WILLIAMS</p> <p>6 Please read this transcript with care, and if</p> <p>7 you find any corrections or changes you wish made, list</p> <p>8 them by page and line number below. DO NOT WRITE IN</p> <p>9 THE TRANSCRIPT ITSELF. Return the</p> <p>10 Certificate and Errata Sheet to this office after</p> <p>11 it is signed. We would appreciate your prompt</p> <p>12 attention to this matter.</p> <p>13 To assist you in making any such corrections,</p> <p>14 please use the form below. If supplemental or</p> <p>15 additional pages are necessary, please furnish same and</p> <p>16 attach them to the errata sheet.</p> <p>17 Page ____ Line ____ should</p> <p>18 read: _____</p> <p>19 Page ____ Line ____ should</p> <p>20 read: _____</p> <p>21 Page ____ Line ____ should</p> <p>22 read: _____</p> <p>23 Page ____ Line ____ should</p> <p>24 read: _____</p> <p>25 Page ____ Line ____ should</p> <p>26 read: _____</p>

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF EPLUS'S OBJECTIONS TO DEFENDANT'S DESIGNATION AND  
SUMMARY OF THE DEPOSITION OF WILLIAM RAY YUHASZ AND VICKY  
MILLER WILLIAMS AND COUNTER-DESIGNATIONS**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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William D. Schultz, *pro hac vice*  
Rachel C. Hughey, *pro hac vice*  
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